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REC'D
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August 10, 2001
EXECUTIVE SECRETARY
Guy M. Hicks
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VIA HAND DELIVERY

David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

Re: *Docket to Establish Generic Performance Measurements, Benchmarks
and Enforcement Mechanisms for BellSouth Telecommunications, Inc.*
Docket No. 01-00193

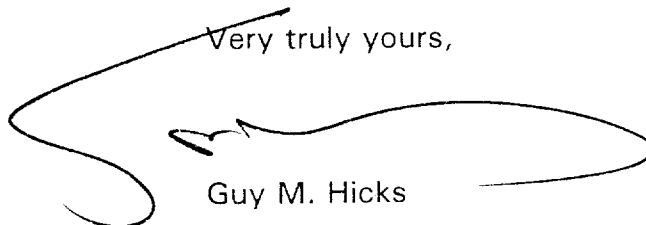
Dear Mr. Waddell:

Enclosed are the original and four paper copies along with CD Rom versions
of Rebuttal Testimony on behalf of BellSouth from the following witnesses:

David Coon
Edward Mulrow
Ronald Pate
William Taylor

The testimony is being provided counsel of record by CD Rom.

Very truly yours,



Guy M. Hicks

GMH:ch
Enclosure

8/10/01

1 BELLSOUTH TELECOMMUNICATIONS, INC.
2 REBUTTAL TESTIMONY OF RONALD M. PATE
3 BEFORE THE TENNESSEE REGULATORY AUTHORITY
4 DOCKET NO. 01-00193
5 AUGUST 10, 2001
6
7

8 Q. PLEASE STATE YOUR NAME, YOUR POSITION WITH BELLSOUTH
9 TELECOMMUNICATIONS, INC. AND YOUR BUSINESS ADDRESS.
10

11 A. My name is Ronald M. Pate. I am employed by BellSouth
12 Telecommunications, Inc. ("BellSouth") as a Director, Interconnection
13 Services. In this position, I handle certain issues related to local
14 interconnection matters, primarily operations support systems ("OSS").
15 My business address is 675 West Peachtree Street, Atlanta, Georgia
16 30375.
17

18 Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.
19

20 A. I graduated from Georgia Institute of Technology in Atlanta, Georgia, in
21 1973, with a Bachelor of Science Degree. In 1984, I received a Masters of
22 Business Administration from Georgia State University. My professional
23 career spans over twenty-five years of general management experience in
24 operations, logistics management, human resources, sales and marketing.

1 I joined BellSouth in 1987, and have held various positions of increasing
2 responsibility since that time.

3

4 Q. HAVE YOU TESTIFIED PREVIOUSLY?

5

6 A. Yes. I have testified before the Public Service Commissions in Alabama,
7 Florida, Georgia, Louisiana, South Carolina, Kentucky, the Tennessee
8 Regulatory Authority and the North Carolina Utilities Commission.

9

10 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

11

12 A I will provide BellSouth's response to certain issues raised by competitive
13 local exchange carriers ("CLECs") in their filings in response to the *Docket*
14 *to Establish Generic Performance Measurements, Benchmarks and*
15 *Enforcement Mechanisms for BellSouth Telecommunications, Inc.*
16 [01-00193] created by the Tennessee Regulatory Authority ("Authority") on
17 February, 21, 2001.

18

19 Specifically, I will provide rebuttal to the direct testimony provided by Ms.
20 Karen Kinard (WorldCom, Inc.) and Mr. Tad Jerret Sauder (Birch Telecom,
21 Inc.). The issues raised in those testimonies relate to BellSouth's change
22 management process and service request flow-through measurements
23 and methodologies.

24

1 While this docket technically deals with performance measurements and
2 associated enforcement, these witnesses have made comments regarding
3 BellSouth's OSS-related issues (change management) that must be
4 corrected. I have responsibility for OSS-related issues, as well as those
5 for flow-through measurements that are more appropriate for this docket.
6

7 Q. ON PAGE 28 AT LINE 23, MS. KINARD IMPLIES THAT THERE
8 SHOULD BE MEASUREMENTS TO ENSURE THAT BELL SOUTH
9 PROVIDES TIMELY NOTIFICATIONS OF SYSTEM OUTAGES TO
10 AVOID HARM TO CLEC OPERATIONS. DOES BELL SOUTH'S SQM
11 ADDRESS THIS ISSUE NOW?
12

13 A. Yes. BellSouth's SQM contains measurements that relate to the Change
14 Control Process ("CCP") and it contains a specific measurement, CM-5,
15 that measures BellSouth's compliance with the Change Control Process
16 requirements for notifications of outages. Having included such a
17 measurement in the SQM, Ms. Kinard's remarks seem to be misplaced.
18

19 Q. DOES THE CHANGE CONTROL PROCESS HAVE DETAILED
20 REQUIREMENTS FOR NOTIFICATION TO THE CLECS WHEN THERE
21 ARE SYSTEM OUTAGES?
22

23 A. Certainly. BellSouth's process for system outage notifications – as well as
24 other notification intervals – is well documented in a publication that is now
25 in Version 2.5, posted to the BellSouth CCP Website on July 18, 2001. I

1 have included that document as Exhibit RMP-1. For every posted version,
2 there is also a companion document, or “working” version (provided as
3 Exhibit RMP-2), that indicates those issues for which there are changes
4 pending, or where there remain differences between the CLECs and
5 BellSouth on specific steps of the process.

6

7 Q. PLEASE DESCRIBE THE PROCESS FOR SYSTEM OUTAGE
8 NOTIFICATION?

9

10 A. Beginning on page 22 of Exhibit RMP-1 is Section 4.0 – Change Control
11 Process Flow that contains an overview of six distinct process flows. A
12 system outage is designated as Type-1 (highest priority). Beginning on
13 page 23 and continuing through page 27 is a detailed explanation of how
14 the process works, including – notably – the notification steps that take
15 place when a system outage occurs – i.e., initial notification for outages
16 exceeding 20 minutes, status notifications on 2-4 hour intervals, resolution
17 notification at 24 hours after outage occurs, final resolution notification
18 within three days of outage, and even an escalation step that is
19 appropriate at any time during the outage if cycle times exceed the times
20 defined by the process. All notifications are readily accessible by all
21 CLECs via the BellSouth Interconnection Website, and provided by e-mail
22 to CLECs that are registered CCP members.

23

24 The notification process is comprehensive, effective, and, importantly,
25 accepted by the CLECs as the defined process. While I can understand

1 Ms. Kinard's concerns with the CLECs receiving timely outage notification,
2 she has failed to provide any support for her claim that there is a problem
3 in this area or why the measurements that BellSouth currently proposes
4 are not sufficient to identify problems with the notification process.
5

6 Q. IN ADDITION TO HER STATED CONCERNS ABOUT OUTAGE
7 NOTIFICATIONS, MS. KINARD INDICATES ON PAGE 29 AT LINES 21
8 AND 24 THAT MEASUREMENTS ARE NECESSARY TO ENSURE
9 TIMELY NOTIFICATIONS OF CHANGES TO INTERFACES, AND
10 ASSOCIATED DOCUMENTATION. CAN YOU RESPOND TO THOSE
11 CONCERNS AS WELL?
12

13 A. Yes. In my previous answer, I referred to BellSouth's proposed
14 measurement CM-5, related to system outages. There are other specific
15 SQM measurements that address the other aspects of the Change Control
16 Process for which Ms. Kinard expresses concern. They are
17 measurements 'CM-1 – Timeliness of Change Management Notices', and
18 'CM-3 – Timeliness of Documents Associated with Change'.
19

20 Q. WHERE IS THE PROCESS FOR NOTIFICATIONS FOR CHANGES TO
21 INTERFACES THAT THESE MEASUREMENTS ADDRESS?
22

23 A. The process – which is part of the CCP's Release Management and
24 Implementation process – is outlined beginning on page 28 of Exhibit
25 RMP-1 (Section 4.0, Part 2 – Types 2-5 Process Flow). Step 10 on page

1 34 is the specific step for notifications for the various types of changes that
2 can occur within the Release Management process.

3

4 For a number of months, the CLECs and BellSouth worked to develop an
5 appropriate and acceptable set of notification intervals. On June 21, 2001,
6 a CCP voting ballot containing notification interval items was issued to the
7 participants in the CCP. The ballots were returned to BellSouth on June
8 28, 2001, and I will note that WorldCom, in spite of Ms. Kinard's concerns
9 on these issues, was not one of the companies returning a ballot.

10

11 Of the 26 items on the ballot, 24 were items that had direct bearing on the
12 Release Management Schedule process, and the 20 items pertaining to
13 notification intervals were approved. The approved items were
14 incorporated into CCP Document Version 2.4 on July 2, 2001, (and they
15 are included in the later CCP Document Version 2.5 that is attached as
16 Exhibit RMP-1).

17

18 These notification deadlines within the context of a comprehensive release
19 management program contain schedules for industry releases (new
20 industry standard(s) that may impact and require the entire CLEC
21 community to make changes to their interfaces), major releases (changes
22 that may require CLECs to make changes to their interfaces), minor
23 releases (changes that may not require CLECs to make changes to their
24 interfaces), and maintenance releases (scheduled maintenance of a
25 BellSouth system). The results of this ballot and subsequent incorporation

1 into the CCP Document should satisfy Ms. Kinard's concerns about
2 notification intervals.

3

4 Q. CAN YOU PROVIDE AN OVERVIEW OF THE ADVANCE
5 NOTIFICATION INTERVALS THAT ARE NOW IN PLACE FOR THE
6 DEPLOYMENT OF INTERFACE RELEASES?

7

8 A. Yes. Step 10 of Section 4.0, at page 35 of the CCP Document (Exhibit
9 RMP-1), provides for the following notification intervals:

10 Major Releases

- 11 • Draft User Requirements for major software releases will be
12 provided to CLECs at least 36 weeks prior to production
- 13 • Final User Requirements for major software releases will be
14 provided to CLECs at least 34 weeks prior to production
- 15 • Final Specifications for major software releases will be provided
16 to CLECs at least 10 weeks prior to production
- 17 • Business Rules associated with major software releases will be
18 provided to CLECs at least 8 weeks prior to production

19 Industry Releases

- 20 • Notification for the implementation of an Industry release will be
21 provided at least 42 weeks prior to production
- 22 • Draft User Requirements for implementation of Industry release
23 will be provided to CLECs at least 40 weeks prior to production
- 24 • Final User Requirements for implementation of Industry release
25 will be provided to CLECs at least 10 weeks prior to production

- Final Specifications for implementation of Industry release will be provided to CLECs at least 10 weeks prior to production
- Business Rules associated with implementation of Industry release will be provided to CLECs at least 8 weeks prior to production

Minor Releases

- Draft User Requirements for the implementation of a minor release will be provided to CLECs at least 19 weeks prior to production (if applicable)
- Final User Requirements for the implementation of a minor release will be provided to CLECs at least 18 weeks prior to production (if applicable)
- Final Specifications for minor software releases will be provided to the CLECs at least 5 weeks prior to production (if applicable)
- The Business Rules associated with minor releases will be provided to the CLECs at least 5 weeks prior to production (if applicable)

Another change regarding notifications to which BellSouth has agreed is related to documentation for non-system-affecting changes (documentation changes not covered in the intervals above). In response to CLEC requests and as a major improvement over earlier versions of the CCP Document, BellSouth will now provide all documentation 30 days in advance. The documentation wording is found on page 36 of Exhibit RMP-1.

1

2 Q. ON PAGE 30, AT LINE 4 OF HER TESTIMONY, MS. KINARD STATES
3 THAT "BELLSOUTH HAS NOT YET INCLUDED A METRIC IN ITS SQM
4 THAT TRACKS WHETHER IT RESPONDS FAIRLY TO CLEC
5 REQUESTS FOR CHANGES AND NEW FUNCTIONALITIES ON ITS
6 INTERFACES." PLEASE RESPOND.

7

8 A. Ms. Kinard is correct when she says BellSouth does not have a metric for
9 that measurement, and there is a good reason for that. All requests for
10 changes to interfaces must come through the BellSouth Change Control
11 Process CCP, and change requests ("CRs") that are accepted for
12 implementation are prioritized by the CLEC-members of the CCP. Ms.
13 Kinard seems to forget that any changes made to interfaces – whether
14 CLEC- or BellSouth-requested – are intended to serve the CLEC
15 community.

16

17 Ms. Kinard is asking this Authority at page 30, line 8 to order BellSouth to
18 measure this aspect of the CCP as if it were a contest. She provides no
19 factual support to justify such a request. To measure the number of CLEC
20 change requests implemented versus the number of BellSouth change
21 requests implemented would be nothing more than a stroke-tally that
22 ignores the content and importance of the change requests themselves.
23 Some change requests simply are more important than others and will
24 have a greater impact. I feel confident that the CLEC community would be
25 happy to see the implementation of a BellSouth change request to remedy

1 a defect or correct a documentation error that benefits the entire CLEC
2 community, and would not be concerned as to who made the change
3 request.

4
5 Ms. Kinard, on the other hand, appears to feel that if BellSouth has a
6 change request implemented, each CLEC is entitled to have one change
7 request implemented, regardless of the nature of the request. Under her
8 approach, a CLEC that had this entitlement could make literally any
9 request – even one that is operationally impossible – and BellSouth would
10 have to fulfill the request to avoid “failing” her proposed measurement.
11 This one-for-one concept simply is not practical from an operational
12 standpoint, nor appropriate from a measurement standpoint.

13
14 Further, Ms. Kinard also suggests that this Authority needs to measure the
15 time that it takes for BellSouth’s CCP to review a CLEC CR versus the
16 time it takes to review one of BellSouth's own CRs. This measurement
17 likewise is unnecessary, as there is an existing step in the current CCP
18 that requires that the CR review step take no more than 20 days –
19 regardless of whether submitted by a CLEC or BellSouth. Recently, as
20 evidenced by voting within the CCP, the CLECs (other than AT&T,
21 naturally) agreed that the existing 20-day interval was reasonable, even as
22 the Florida Public Service Commission was deciding in an individual
23 arbitration (FPSC Docket No. 000731-TP) that the interval should be
24 reduced to 10 days. Ms. Kinard’s implication that there is somehow a
25 difference in the review interval to the benefit of BellSouth over the CLECs

1 rings hollow, and statistics show that BellSouth consistently provides
2 responses to CRs within the currently allotted interval.

3

4 On page 30, at line 18, Ms. Kinard has yet another suggestion for an
5 unnecessary measurement, and, similarly, provides no substantive
6 evidence that there is a demonstrated deficiency on BellSouth's part to
7 warrant such a measurement. She calls into question the sufficiency of
8 BellSouth's testing prior to software upgrades, and supports her desire for
9 a metric in this area by stating at line 20 that such a measurement would
10 provide "assurance that BellSouth will sufficiently test before a system is
11 rolled out."

12

13 BellSouth currently has standards by which it does its pre-deployment
14 testing, and obviously would not be interested in knowingly deploying
15 systems with defects to the detriment of both CLECs and itself. In fact,
16 there have been occasions when BellSouth either delayed a deployment
17 or removed defective functionality from a release to avoid the types of
18 problems Ms. Kinard envisions. Given that BellSouth currently pre-tests to
19 the limits of reasonableness, with the obvious intent of providing a useable
20 and defect-free product, and does so without an indication of a deficiency
21 thereof, any metric in this regard would provide no additional incentive, or
22 serve any useful purpose.

23

24 I will also note that as an added testing assurance measure, BellSouth
25 currently offers through the CCP an opportunity for CLECs themselves to

1 test functionality in a pre-deployment test environment. BellSouth's CLEC
2 Application Verification Environment ("CAVE") allows CLECs to perform
3 functional testing, and the specifics of CAVE testing are described in
4 Section 10.0 – Testing Environment in the current CCP Document (page
5 65 of Exhibit RMP-1). Such an environment is useful for CLECs to
6 determine if there are defects in their own programming that might cause
7 post-deployment problems.
8

9 Q. HOW SHOULD THIS AUTHORITY RESPOND TO MS. KINARD'S
10 REQUESTS FOR ADDITIONAL METRICS IN THE AREA OF CHANGE
11 MANAGEMENT?
12

13 A. Meaningful change management metrics already exist in BellSouth's
14 proposed Service Quality Measurements ("SQM") in Tennessee and the
15 other BellSouth states. Among others, these metrics include CM-1 –
16 Timeliness of Change Management Notices, CM-3 – Timeliness of
17 Documents Associated with Change, and CM-5 – Notification of CLEC
18 Interface Outages, all of which BellSouth's witness David Coon can more
19 fully explain. Nothing else is required.
20

21 Q. ON PAGE 30 AT LINE 6, MS. KINARD ALLEGES THAT BELL SOUTH
22 IGNORES THE CLEC CHANGE REQUEST PRIORITIZATION AND
23 IMPLEMENTS CHANGES WHENEVER IT CHOOSES. IS THIS TRUE?
24

1 A. No. Ms. Kinard is incorrect, and again provides no substantiation for her
2 allegations. She at least recognizes that the CLECs prioritize the CRs.
3 As I have stated in previous testimony about the CCP before this Authority
4 [Docket No. 00-00079], BellSouth is a firm believer in the CCP, and has
5 never acted irresponsibly upon CRs in the manner that Ms. Kinard has
6 alleged, nor does BellSouth plan to do so in the future. There is an entire
7 section of the CCP process devoted to release management, CR
8 prioritization and release scheduling, and it is part of the same Section 4.0
9 – Part 2 that I described in the previous answer.

10
11 It is clearly noted on page 30 of Exhibit RMP-1 that BellSouth has the
12 ability to reject CRs for reasons of cost, industry direction and technical
13 unfeasibility during the CR acceptance review step (Step 3 of Section 4.0).
14 Once the CRs have been accepted as candidates for implementation and
15 are prioritized, BellSouth is committed to implement the CRs as
16 scheduled. With that said, it is not without precedent that individual
17 features from prioritized CRs were not actually implemented at the time of
18 the release, but it is a fact of life in an electronic and software environment
19 that unforeseen anomalies can occur in the testing and implementation
20 phase of a release. Rather than jeopardize an entire release for the sake
21 of individual features, and as I stated earlier in this testimony, BellSouth
22 sometimes chooses to remove the offending feature(s) from the initial
23 release. Those feature defects are repaired, and the features installed in
24 a sub-release at a later date.

1 It may also seem to the uninitiated that BellSouth sometimes installs lower
2 priority features in a release, while not including higher priority features.
3 This is a function of release capacity or development capability. Some
4 features require small amounts of software memory or do not have high
5 development resource requirements. Since these features are to be
6 installed at some point anyway, they can sometimes be added to a
7 release with a minimum of resource expenditure – and not at the expense
8 of a higher priority feature. A higher priority feature would have required
9 more space in the software than was available, or extended development
10 time might have caused a release interval that was not acceptable to the
11 CLECs.

12

13 Q. MOVING FROM THE CCP TO THE ISSUE OF FLOW-THROUGH, IN
14 THE SECTION ON FLOW-THROUGH ON PAGE 2 OF HER EXHIBIT KK-
15 A, MS. KINARD STATES THAT “BELLSOUTH’S SQM [“SERVICE
16 QUALITY MEASUREMENTS”] SHOULD NOT EXCLUDE ORDERS THAT
17 FALL TO MANUAL, THROUGH NO FAULT OF THE CLEC, FROM THE
18 METRIC.” IN A LATER SENTENCE, SHE STATES THAT “IT
19 [BELLSOUTH] SHOULD BE HELD ACCOUNTABLE FOR ITS DECISION
20 NOT TO PROVIDE FLOW-THROUGH.” PLEASE RESPOND.

21

22 A. Ms. Kinard appears to incorrectly assume that everything – except those
23 service requests that fall out due to CLEC error – should flow through
24 BellSouth's systems without the need for manual intervention. That simply
25 is not the case, and, as I will discuss in more detail below, there is

1 regulatory support for BellSouth's position on flow-through and associated
2 calculations.

3

4 When Ms. Kinard makes reference to BellSouth's "decision not to provide
5 flow-through," she is referring to types of orders for which there currently is
6 no designed capability for converting a CLEC's Local Service Request
7 ("LSR") format to a BellSouth Service Order Communications System
8 ("SOCS") format. Mr. Sauder (Birch Telecom) has similar concerns in his
9 testimony on page 8. For a number of service offerings that can be
10 ordered by CLECs electronically, there is justification for BellSouth having
11 made such a decision – and a number of regulatory precedents allowing
12 such a decision.

13

14 Q. PLEASE PROVIDE EXAMPLES OF THOSE REGULATORY
15 PRECEDENTS?

16

17 A. In a letter from the FCC's Common Carrier Bureau Staff in February 1999
18 (provided as Exhibit RMP-3), Bureau Chief Lawrence Strickling, in an
19 interpretation of the Commission's BellSouth Louisiana II Order, confirmed
20 in Section 1 that BellSouth could exclude complex orders from flow-
21 through calculations. That same letter further confirmed in Section 4 that
22 there is no requirement that all types of orders be capable of electronic
23 submission by a CLEC.

24

1 Further, in its approval of in-region interLATA services for Southwestern
2 Bell Telephone Company for Texas (FCC 00-238, Para. 180), Bell Atlantic
3 for New York (FCC 99-404, Footnote 488), and, more recently, Verizon for
4 Massachusetts (FCC 01-130, at Para. 79), the FCC recognized that some
5 services could be properly designed to fall out for manual processing. In
6 those orders, the FCC also upheld that nondiscriminatory access does not
7 require that all service requests be submitted electronically in the first
8 place.

9

10 Q. WHAT IS BELL SOUTH'S JUSTIFICATION FOR ITS DECISION TO
11 EXCLUDE CERTAIN TYPES OF ORDERS FROM FLOW-THROUGH
12 CAPABILITY?

13

14 A. In addition to the exclusion of complex orders from the flow-through
15 requirement – and, consequently, exclusion from the flow-through
16 calculations – BellSouth has, in fact, determined that certain other types of
17 service requests do not lend themselves to flow-through – even though
18 those service requests can be issued electronically. These decisions
19 were made due to the complexities or impossibilities of developing the
20 programming to translate the LSR format to the SOCS format, or the fact
21 that it does not make economical business sense to expend the resources
22 to do such translation programming for service request types that have a
23 relatively low-volume ordering incidence.

24

1 Q. WHAT ARE SOME EXAMPLES OF THE TYPES OF SERVICE
2 REQUESTS THAT FALL INTO THIS CATEGORY?

3
4 A. Included in this non-complex, non-flow-through category are services or
5 situations such as some CLEC-requested expedites, requests with special
6 pricing plans associated, some partial migrations, requests to restore or
7 suspend for previously-provisioned UNE combos, requests with more than
8 25 lines, some special directory listing requests, and situations where new
9 telephone numbers have not yet posted to the Business Office Customer
10 Records Information System ("BOCRIS"). Many of these services or
11 situations are unique to the CLEC environment, and, thus, have no
12 BellSouth equivalent.

13
14 BellSouth has published a list of service request types and situations that
15 are designed for fall-out. For a complete overview of the list of flow-
16 through/non-flow-through services and situations, I have provided an
17 excerpt (Pages 1-3) of the Tennessee Performance Metrics LSR Flow-
18 Through Matrix (dated July 16, 2001) as Exhibit RMP-4. As BellSouth's
19 interfaces and OSS have region-wide capabilities, this list is consistent
20 throughout the nine states of the BellSouth region.

21
22 I will mention that if a CLEC wishes a certain type of service or request to
23 flow through or to be submitted electronically (if currently manual only),
24 there is a defined process for making such a request to BellSouth. A
25 CLEC can issue a CR through the CCP to determine the whether such a

1 request is feasible. BellSouth is committed to investigating all such
2 requests to the fullest extent possible to satisfy CLEC needs whenever
3 possible.

4

5 Q. IN THAT SAME SECTION OF EXHIBIT KK-A, MS. KINARD CITES AN
6 OBLIGATION FOR BELL SOUTH TO "PROVIDE PARITY SERVICE" AS
7 IT RELATES TO ORDER PROCESSING AND SHE ALLEGES A LACK
8 OF "EVIDENCE THAT SUCH ORDERS FALL OUT FOR MANUAL
9 PROCESSING FOR ITS RETAIL OPERATION." MR. SAUDER (BIRCH
10 TELECOM) SAYS THE SAME ON PAGE 7, AT LINE 16, OF HIS
11 TESTIMONY. PLEASE RESPOND.

12

13 A. Regarding the alleged lack of "evidence that such orders fall out for
14 manual processing for its retail operation," I refer to the letter from FCC
15 Common Carrier Bureau Chief Strickling that was previously discussed
16 (Exhibit RMP-3, Section 1). The FCC recognized that BellSouth does, in
17 fact, manually process its own retail complex requests. In a sense, a
18 BellSouth retail request of this type – as well as those for more complex
19 situations – 'begins life' in a fall-out condition. Indeed, SOCS will not
20 accept the request from a BellSouth representative unless it is correctly
21 built. Therefore, requests from CLECs must be correctly – and manually –
22 built on the LSR (which is then translated to a SOCS-compatible format) –
23 just as a BellSouth retail representative manually builds and submits such
24 orders to SOCS. As I stated earlier, many of the services and situations
25 that fall out for CLECs have no equivalent in a BellSouth retail

1 environment, and, therefore, no comparison can be – nor needs to be –
2 made.

3

4 Q. IN HIS TESTIMONY ON PAGE 7, BEGINNING AT LINE 10, MR.
5 SAUDER SUGGESTS THAT BELL SOUTH'S INABILITY TO
6 MECHANICALLY PROCESS ORDERS WILL HAVE A DETRIMENTAL
7 EFFECT ON CLECS. PLEASE RESPOND.

8

9 A. I would refer to the earlier response I gave to Ms. Kinard's allegations
10 about BellSouth's "decision not to provide flow-through." In spite of rulings
11 that have said that BellSouth is not required to provide flow-through on all
12 types of requests, or that some types of requests do not lend themselves
13 to flow-through, the fact of the matter is that BellSouth itself greatly
14 benefits from mechanization. BellSouth certainly understands that manual
15 transactions are more costly or time-consuming than mechanized orders –
16 for CLECs and BellSouth – and has made an effort to mechanize those
17 types of requests that are not in the categories as described above.

18

19 Q. MS. KINARD STATES IN HER EXHIBIT THAT BELL SOUTH DOES NOT
20 PROVIDE FLOW-THROUGH REPORTING FOR LNP [LOCAL NUMBER
21 PORTABILITY] LSRs. IS SHE CORRECT?

22

23 A. No. BellSouth has provided LNP flow-through reporting since October
24 1999.

25

1 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

2

3 A. Yes.

AFFIDAVIT

STATE OF: Georgia
COUNTY OF: Fulton

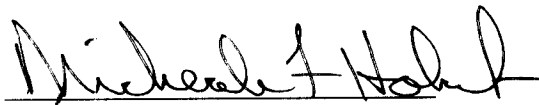
BEFORE ME, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid, personally came and appeared Ronald M. Pate –Director – Interconnection Operations, BellSouth Telecommunications Inc., who, being by me first duly sworn deposed and said that:

He is appearing as a witness before the Tennessee Regulatory Authority in Docket No. 01-00193 on behalf of BellSouth Telecommunications, Inc., and if present before the Authority and duly sworn, his testimony would be set forth in the annexed testimony consisting of 20 pages and 4 exhibit(s).



Ronald M. Pate

Sworn to and subscribed
before me on 4/10/01



NOTARY PUBLIC

MICHEALE F. HOLCOMB
Notary Public, Douglas County, Georgia
My Commission Expires November 3, 2001

Transmittal Cover Sheet for Pate Rebuttal Exhibit RMP-1

This sheet transmits the
BellSouth Change Control Process Guide, Version 2.5 (Posted July 18, 2001)
which consists of 84 pages.



CHANGE CONTROL PROCESS

CCP7_18.DOC

VERSION 2.5

JULY 18, 2001

Issued: 7/18/01

Jointly Developed by the Change Control Sub-team comprised
of BellSouth and CLEC Representatives.

BellSouth Telecommunications reserves the right to revise this document for any reason, with concurrence of the CLEC/BellSouth Review Board, including but not limited to, conformity with standards promulgated by various government or regulatory agencies, utilization of advance in the state of the technical arts, or the reflection of changes in the design of any equipment, techniques, or procedures described or referred to herein. LIABILITY TO ANYONE ARISING OUT OF USE OR RELIANCE UPON ANY INFORMATION SET FORTH HEREIN IS EXPRESSLY DISCLAIMED, AND NO REPRESENTATIONS OR WARRANTIES, EXPRESSED OR IMPLIED, ARE MADE WITH RESPECT TO THE ACCURACY OR UTILITY OF ANY INFORMATION SET FORTH HEREIN.

This document is not to be construed as a suggestion to any manufacturer to modify or change any of its products, nor does this document represent any commitment by BellSouth Telecommunications to purchase any product whether or not it provides the described characteristics.

This document is not to be construed as a contract. It does not create an obligation on the part of BellSouth Telecommunications or the Competitive Local Exchange Carriers to perform any modification, change or enhancement of any product or service.

Nothing contained herein shall be construed as conferring by implication, estoppel or otherwise, any license or right under any patent, whether or not the use of any information herein necessarily employs an invention of any existing or later issued patent.

Issued: 07/18/01

Jointly Developed by the Change Control Sub-team comprised
of BellSouth and CLEC Representatives.

VERSION CHANGE HISTORY

This section list changes made to the baseline Electronic Interface Change Control Process document since the last issue. New versions of this document may be obtained via BellSouth's Web site.

Version	Issue Date	Section Revised	Reason for Revision
1.0	04/14/98		Initial issue.
1.2	2/28/00	All	<p>The EICCP Documentation has been modified to incorporate:</p> <ul style="list-style-type: none">- Multiple Change Request Types (CLEC Initiated, BST Initiated, Industry Standards, Regulatory and System Outages)- Incorporated manual process- Defined cycle times for process intervals and notifications- Defect Notification process- Escalation Process- Modified Change Control forms to support process changes- Changed EICCP to CCP
1.3	3/14/00	All	<p>The CCP Documentation has been modified to incorporate:</p> <ul style="list-style-type: none">- Type 6 Change Request, CLEC Impacting Defect- Increased number of participants at Change Review meetings- Changed cycle time for Types 2-5 Step 3 from 20 days to 15 days- Defined Step 4 of the Defect Notification process to include communicating the workaround to the CLEC community- Web Site address for Change Control Process- Notification regarding the Retirement and

			<p>Introduction of new interfaces</p> <ul style="list-style-type: none"> - New status codes for Defect Change Requests - New status codes: 'S' for Scheduled Change Requests and 'I' for Implemented Change Requests (types 2-5 Change Requests) - Removed reference to EDI Helpdesk. Electronic Communications Support (ECS) will be the first point of contact for Type 1 System Outages. - Word changes to provide clarification throughout the document.
1.4	4/12/00	All	<p>The CCP Documentation has been modified to incorporate:</p> <ul style="list-style-type: none"> - Type 1 and 6 Notifications will be communicated to CLECs via e-mail and web posting - Step 3 Cycle Time (Types 2-5) changed from 15 business days to 20 business days - Verbiage to Step 10 (Types 2-5) regarding BellSouth presenting baseline requirements - Introduction and Retirement of New Interfaces Section - Dispute Resolution Process - Testing Environment Section - Word changes to provide clarification throughout the document - Monthly Status Meeting Agenda Template - RF1870 Change Request Form changes
1.5	4/26/00	<p>Section 1</p> <p>Section 8</p> <p>Section 11</p>	<ul style="list-style-type: none"> - Updated CCP web site address - Updated Escalation Contacts for Types 2-6 - Added definitions for Account Team and Electronic Communications Support (ECS)
1.6	7/20/00	<p>Section 1</p> <p>Section 2</p>	<ul style="list-style-type: none"> - Added "testing" under process changes - Clarification provided in "Change Review Participants" description

			Participants” description.
		Section 4	- Added statement regarding submittal of Change Requests
		Part 2	- Clarification provided for documentation changes for business rules
			- Step 2-Added email notification
			- Step 3-Removed “Cancellation by BellSouth”
			- Step 3-Clarification on reject reasons
		Section 5	- Step 3-Clarification on internal validation activities
			- Step 4-Changed cycle time from 5 to 4 bus days for develop workaround
			- Added defect implementation range
		Section 6	- Changed prioritization from “by interface” to “by category”
			- Changed timeframe for receiving a Change Request prior to a Change Review Meeting from 33 to 30 business days
			- Modified the prioritization voting rules
		Section 7	- Updates to the Introduction and Retirement of Interfaces
		Section 8	- Added Type 6 escalation turnaround time
			- Changed 3 rd Level Escalation contacts for Types 2-6
		Section 11	- Removed “Cancellation by BellSouth” and “Defect Cancelled” definitions
		Appendix A	- Removed “Cancellation by BellSouth” from Change Request Form and Checklist
			- Added Letter of Intent Form
		Appendix C	- Changes to the following forms: Preliminary Priority List, CCP User Registration Form. Added the following forms: Defect Notification Sample, CR Log Legend.
		Appendix D	- Added BellSouth Versioning Policy

		All	Word changes to provide clarification throughout the document.
2.0	08/23/00	<p>Cover</p> <p>Section 3</p> <p>Section 5</p> <p>Section 10</p> <p>Section 11-Terms & Definitions</p> <p>Appendix A</p> <p>All</p>	<ul style="list-style-type: none"> - Removed "Interim" from cover. - Updated Type 6 definition to incorporate new defect and expedited feature definitions. - Replaced Section 5, Defect Notification Process with a "Draft" Defect/Expedite Notification Process. - Reduced the implementation interval for validated defects (High Impact) from 4 - 30 business days to 4 - 25 business days, best effort. - Added Internet Web sites for EDI and TAG Testing Guidelines - Updated definition for Defect. Added definitions for Expedited Feature, High, Medium and Low Impacts. - Modified Change Request Forms (RF1870 and RF1872) to include email address for Change Control. Also added High, Medium and Low Assessment of Impact Levels. - Referenced the handling of expedites and expedite notification where appropriate.
2.1	02/09/01	<p>Section 1 – Introduction</p> <p>Section 3 – Introduction</p> <p>Section 4 – Part 1 Type 1 Detail Process Flow</p>	<ul style="list-style-type: none"> - Added new language to the 8th bulleted item – "including User Guides that support OSS systems currently within the scope of CCP" - Added two new bulleted items dealing with the coordination of test agreements, and questions regarding existing documentation. - Added "language" for Types 2, 3, 4 & 5 – "Type xx changes may be managed using the Expedited Feature Process as discussed in Section 4, Part 3." - Type 6 – CLEC Impacting Defects – Added new defect definition. - Added #4 to the Activities – Step 1

		<p>Section 4 – Part 2 – Types 2-5 Process Flow</p> <p>Section 4 – Part 3 – Expedited Feature Process</p> <p>Section 5 – Part 3 – Defect Process</p>	<ul style="list-style-type: none"> - Added additional sentence to Activity #1 – Step 2 - Added Activity #5 – Step 4 - Added new Expedited Feature Process definition and flow - New Defect title page and definition. - Table 5-1 – Step 1 – Activity - #4 – Attach related requirements and specifications documents. These attachments must include the following, if appropriate. - Table 5-1 – Step 2 – Cycle Time – Replaced old cycle times with: 4 hrs for High Impact, 1 Bus Day for Medium and Low Impact. - Table 5-1 – Step 3 – Cycle Time – Replaced old cycle times with: 2 Bus Day for High Impact, and 3 Bus Days for Medium and Low Impact - Table 5-1 – Step 3 – Outputs – Added new bullet – “Status provided for High Impact Defects to originator via email with 24 hours” - Table 5-1 – Step 4 – Activity – Added language to Activity #3 - ...and to the CLEC community via email and web posting. - Table 5-1 – Step 4 – Cycle Time – Replaced old cycle times with: 2 Bus Days for High Impact and 4 Bus Days for Medium and Low Impact. - Table 5-1 – Step 5 – Activity – Added language to #1 - ...to the CLECs and BellSouth. Added language to Activity #2 - ...defect is implemented. - Table 5-1 – Step 5 – Cycle Time – Replaced old cycle times to reflect: Validated High Impact Defects will be implemented within a 4-25 business day range, best effort. Medium
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		<p>Part 1 – Change Review-Prioritization – Release Package Development and Approval</p> <p>Section 7 – Introduction and Retirement of Interfaces</p> <p>Section 8 – Escalation Process</p> <p>Section 8 – Dispute Resolution Process</p> <p>Appendix A</p> <p>Appendix C</p>	<p>4-25 business day range, best effort. Medium Impact will be implemented within 90-bus day, best effort. Low Impact will be implemented best effort.</p> <ul style="list-style-type: none"> - Part 1 – Change Review Meeting – 4th paragraph NOTE: Added language to address meetings would occur in March, June, September and December - Part 2 – Change Review Meeting – 4th bullet – Added new bullet - ...BellSouth's estimate of the size and scope of each Change Request. - Part 4 – Developing and Approving Release Packages – 1st bulleted item: New language - Retirement of Interfaces – 1st paragraph sentence: New language - Retirement of Versions – New Language - Retirement of Versions – Appeal Language - New Language for Type 6 High Impact Issues and Medium and Low Impact issues. - Types 2-6 Changes – 1st paragraph – new language. - Types 2-6 Changes – Contact List for High, Medium and Low Impact escalations. - New definition language - Updated CR form & checklist - Updated RF1874 User Registration Form
2.1A	02/15/01	All	<ul style="list-style-type: none"> - Updated various sections of the document to change "language" from defect/expedite to defect and/or expedited features. - Changed reference from Section 9.0 to Section 11.0 – Terms and Definitions where

		Section 8	<p>appropriate.</p> <ul style="list-style-type: none"> - Minor “cosmetic” changes throughout document. - New 2nd Level Escalation Contacts for Types 2-6
2.2	03/26/01	<p>Section 3</p> <p>Section 4</p>	<ul style="list-style-type: none"> - Replaced “business or software requirements” with “user requirements” throughout definition. - Updated the “Type 1 System Outage” language to reflect the posting of outages via email within 15 minutes of verified outage. - Additional language for Step 3 – Reviewing Change Request for Acceptance. - Additional language for Step 3 – OBF issues - Added word “preliminary” in Activity #5 of Step 4 – Prepare for Change Review Meeting - Additional language for Step 4 – Prepare for Change Review Meeting – Sizing information - Added Activities #4 & #5 under Step 5 – Conduct Change Review Meeting. - Updated Activity #3 under Step 5 – Conduct Change Review Meeting – Prioritization Meetings. - Updated Activities #4, #5, #7, & #8 under Step 8 – Conduct Release Package Meeting including Inputs and Outputs. - Updated the 1st bulleted statement in Step 9 – Create Release Package Notification. - Added words “for software changes” in Activity #3 under Step 10 – Release Management and Implementation. - Updated Activity #4 in Step 5 – Release Management and Implementation to clarify “associated with expedited features”...“if applicable”. - Added the words “submitted” to define the

			<p>type of defect; the word “ordering” to define the type of enhancement; and the word “interface” to replace the words “product and services” throughout the definition of Expedited Feature – Part 3.</p>
		Section 5	<ul style="list-style-type: none"> - Part 3 – Expedited Feature Process – Step 4 – Internal Change Management Process: Added the word “minor” to better identify the type of release that formerly was identified as “point”. Also updated language in Cycle Time to reflect “case by case basis not to exceed 25 days.” - Updated flow-chart - Figure 5-1 – Type 6 Process Flow to reflect agreed upon cycle times. - Updated Title Page and Definition – Defect Process – 2nd paragraph – Added word “user” to identify type of requirements. - Added additional bullets (#5 and #6) to Step 3 – Type 6 Detail Process Flow – Internal Validation. - Updated cycle times for High, Medium and Low Impact Defects in Step 3 – Internal Validation. - Updated cycle times for High, Medium and Low Impact Defects in Step 4 – Develop and Validate Workaround.
		Section 6	<ul style="list-style-type: none"> - Updated 1st paragraph in Part 1 – Change Review Meeting to identify categories (pre-order/order, maintenance, manual and documentation, etc.) - Added word “preliminary” to 4th bulleted statement in Part 2 – Change Review Package. - Added new 4th bulleted item under Part 3 – Prioritizing Voting Rules. - Updated 6th bulleted statement under Part 3 – Prioritizing Voting Rules to reverse the forced ranking to read (1 to N, with 1 being the highest) - Added new 7th bulleted item under Part 3 – Prioritizing Voting Rules to add the words “or have little value to the CLEC”.

		Section 7	<ul style="list-style-type: none"> - Updated the language for the "Introduction of New Interfaces".
		Section 8	<ul style="list-style-type: none"> - Updated 1st paragraph – 1st sentence under "Retirement of Interfaces". - Added new 7th bulleted item under the "Escalation Process – Guidelines" to specify the time allowed for a status for Type 6 High Impact and Medium and Low Impact issues. - Added new 8th bulleted item under the "Escalation Process – Guidelines" to specify the time allowed for a status for Types 2-5 Expedited Feature Process issues.
		Section 9	<ul style="list-style-type: none"> - Removed the entire section under the "Contact List for Escalation – Types 2-6 Changes" since duplication exists under "Guidelines". - Updated the entire section under "Changes to the Process" with new language.
		Appendix	<ul style="list-style-type: none"> - Added a new section in the Appendix to define the "Sub-Team Definition and Roles/Responsibilities". - Added a new section in the Appendix to give a "Sample" Voting Ballot
2.3	05/18/01	Section 4	<ul style="list-style-type: none"> - Updated Step 3, Activity #3, first "bulleted" item to identify a "CLEC" training issue. - Updated Step 5, Activity #7 to remove reference to 'CRC' status. - Updated Step 7, Activity #1 to remove "criteria established by the Internal Change Management Process" language.
		Section 5	<ul style="list-style-type: none"> - Added separate section (5.2) to document the flow for Documentation Defects.
2.4	07/02/01	Section 4.0	<ul style="list-style-type: none"> - Part 2 – Types 2-5 Process Flow – Step 6 – Document Change Review Meeting Results – Cycle Time – 5 days - Part 2 – Types 2-5 Process Flow – Step 7 – Internal Change Management Process – Cycle Time – Quarterly

			<ul style="list-style-type: none"> - Part 2 – Types 2-5 Process Flow – Step 7 – Internal Change Management Process – Activity 2 “Sizing and Sequencing of prioritized change requests...” - Part 2 – Types 2-5 Process Flow – Step 8 – Conduct Release Package Meeting – Activity 4 - Part 2 – Types 2-5 Process Flow – Step 8 – Conduct Release Package Meeting – Cycle Time – Major and Minor Releases - Part 2 – Types 2-5 Process Flow – Step 10 – Release Management and Implementation – Activity 4 – Major Releases – Draft User Requirements - Part 2 – Types 2-5 Process Flow – Step 10 – Release Management and Implementation – Activity 4 – Major Releases – Final User Requirements - Part 2 – Types 2-5 Process Flow – Step 10 – Release Management and Implementation – Activity 4 – Major Releases – Final Specs - Part 2 – Types 2-5 Process Flow – Step 10 – Release Management and Implementation – Activity 4 – Major Releases – Business Rules - Part 2 – Types 2-5 Process Flow – Step 10 – Release Management and Implementation – Activity 4 – Industry Releases – Notification - Part 2 – Types 2-5 Process Flow – Step 10 – Release Management and Implementation – Activity 4 – Industry Releases – Draft User Requirements - Part 2 – Types 2-5 Process Flow – Step 10 – Release Management and Implementation – Activity 4 – Industry Releases – Final User Requirements - Part 2 – Types 2-5 Process Flow – Step 10 – Release Management and Implementation – Activity 4 – Industry Releases – Final EDI Specs - Part 2 – Types 2-5 Process Flow – Step 10 – Release Management and Implementation – Activity 4 – Industry Releases – Business
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			<p>Rules</p> <ul style="list-style-type: none"> - Part 2 – Types 2-5 Process Flow – Step 10 – Release Management and Implementation – Activity 4 – Minor Releases – Draft User Requirements - Part 2 – Types 2-5 Process Flow – Step 10 – Release Management and Implementation – Activity 4 – Minor Releases – Final User Requirements - Part 2 – Types 2-5 Process Flow – Step 10 – Release Management and Implementation – Activity 4 – Minor Releases – Final Specs - Part 2 – Types 2-5 Process Flow – Step 10 – Release Management and Implementation – Activity 4 – Minor Releases – Business Rules - Part 2 – Types 2-5 Process Flow – Step 10 – Release Management and Implementation – Adding sub-process activity #5 - Part 2 – Types 2-5 Process Flow – Step 10 – Release Management and Implementation – Activity #5 - Part 2 – Types 2-5 Process Flow – Step 10 – Release Management and Implementation – Outputs – Adding four (4) bulleted items
		Section 6.0	<ul style="list-style-type: none"> - Part 3 – Expedited Feature Process – Step 3 – Review Change Request for Acceptance - Part 2 – Change Review Package – Adding bulleted statement “Schedule of releases” - Part 4 – Developing and Approving Release Packages – Defining by release when the evaluation and analyzing Candidate Change Requests will take place.
		Section 10.0	<ul style="list-style-type: none"> - Part 4 – Developing and Approving Release Packages – Defining what will occur during the Release Package meeting. - Testing Environment – Adding “Language” to define “testing opportunities”.
		Terms and Definitions	<ul style="list-style-type: none"> - Updated Release definitions - Added Appendix G – Customer Notifications

		Appendix	
2.5	07/18/01	Section 9	- Removed "BellSouth" from voting language (associated with CR0411)
		Section 8	- Updated 1 st point of contact for escalating Type 1 system outage process.

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1.0 INTRODUCTION

This document establishes the process by which BellSouth Telecommunications (BST) and Competitive Local Exchange Carriers (CLECs) will manage requested changes to the BellSouth Local Interfaces, the introduction of new interfaces, and provide for the identification and resolution of issues related to Change Requests. This process will cover Change Requests that affect external users of BellSouth's Electronic Interface Applications, associated manual process improvements, performance or ability to provide service including defect/expedite notification. This process shall be referred to as the Change Control Process.

All parties should recognize that deviations from this process might be warranted where unanticipated circumstances arise such that strict application of these guidelines may not result in their intended purpose. Furthermore, deviations may be required due to specific regulatory and business requirements. Parties shall provide appropriate web notification to the CLEC/BST Change Control Team participants prior to deviating from the processes established within this document. All parties will comply with all legal and regulatory requirements.

The Change Control Process will cover change requests for the following interfaces and associated manual processes that have the potential to impact the interfaces connected to BellSouth:

- Local Exchange Navigation System (LENS)
- Electronic Data Interchange (EDI)
- Telecommunications Access Gateway (TAG)
- Trouble Administration Facilitation Interface (TAFI)
- Electronic Communications Trouble Administration (EC-TA) Local
- CLEC Service Order Tracking System (CSOTS)

The types of changes that will be handled by this process are as follows:

- Software
- Hardware
- Industry Standards
- Product and Services (i.e., new services available via the in-scope interfaces)
- New or Revised Edits
- Process (i.e., electronic interfaces and manual processes relative to order, pre-order, maintenance and testing)
- Regulatory
- Documentation (i.e., business rules for electronic and manual processes relative to order, pre-order, maintenance, including User Guides that support OSS systems currently within the scope of CCP)
- Defects

- Expedited Features

The scope of the Change Control Process **does not** include the following, which are handled through existing BellSouth processes:

- BonaFide Requests (BFR)
- Production Support (i.e. adding new users to existing interfaces, existing users requesting first time use of existing BST functionality)
- Contractual Agreements
- Collocation
- Coordination of test agreements will continue to be supported by the Account Team
- Questions regarding existing documentation should be handled by the Account Team. However, if documentation needs to be changed for clarification purposes, a defect change request should be submitted through Change Control

OBJECTIVES OF THE CHANGE CONTROL PROCESS:

- Support the Industry guidelines that impact Electronic Interfaces and manual processes relative to order, pre-order, maintenance, and billing as appropriate
- Ensure continuity of business processes and systems operations
- Establish process for communicating and managing changes
- Allow for mutual impact assessment and resource planning to manage and schedule changes
- Capability to prioritize requested changes

The minimum requirements for participation in the Change Control Process electronically are:

- Word 6.0 or greater
- Excel 5.0 or greater
- Internet E-mail address
- Web access

The web site address for the Change Control Process is as follows:

http://www.interconnection.bellsouth.com/markets/lec/ccp_live/index.html

2.0 CHANGE CONTROL ORGANIZATION

The Change Control organizational structure supports the Change Control Process. Each position within the organization has defined roles and responsibilities as outlined in the Change Control Process Flow - Section 4 of this document. Identified positions, along with associated roles and responsibilities are as follows:

Change Review Participants. Representatives from Competitive Local Exchange Carriers (CLECs) and BellSouth. This team meets to review, prioritize, and make recommendations for Candidate Change Requests. The Candidate Change Requests are used as input to the Internal Change Management Processes (refer to process step 7 for Types 2-5 changes).

CLECs and BellSouth will define points of contact in each of their companies for communicating and coordinating change notification. All change requests are made in writing (e-mail is preferred). Notifications will be provided via e-mail and posted to the BellSouth web site.

Each company may bring the number of participants necessary to represent their position. If the number of participants grows to be unmanageable, CLECs and BellSouth will revisit the issue of representation to apply some restrictions.

BellSouth Change Control Manager (BCCM). The BCCM is responsible for managing the Change Control Process and is the main point of contact for Types 2 – 6 changes. This individual maintains the integrity of the Change Requests, prepares for and facilitates the Change Review Meetings, presents the Pending Change Requests to the BST Internal Change Management Process, and ensures that all Notifications are communicated to the appropriate parties.

CLEC Change Control Manager (CCCM). The CCCM is the CLEC point of contact for Change Requests. This individual is responsible for presenting and prioritizing Change Requests at the Change Review Meetings.

Release Management Project Team. A team of CLEC and BellSouth Project Managers who manage the implementation of scheduled changes and releases.

3.0 CHANGE CONTROL DECISION PROCESS

Change requests will be classified by Type. There are six Types:

Type 1 – System Outage

A Type 1 change is a BellSouth System Outage. A System Outage is where the system is totally unusable or there is degradation in an existing feature or functionality within the interface. If the System Outage is not resolved within 20 minutes, a notification will be provided via e-mail and posted to the web within 15 minutes of the outage verification. Either BellSouth or a CLEC may initiate the change request. Type 1 system outages will be processed on an expedited basis. All Type 1 System Outages will be reported to the Electronic Communications Support (ECS) Help Desk. A Type 1 System Outage is a condition where the CLEC Pre-Orders/Orders/Queries/Maintenance Requests cannot be submitted or will not be accepted by BellSouth.

Type 2 – Regulatory Change.

Any non-Type 1 change to the interfaces between the CLEC's and BellSouth's operational support systems mandated by regulatory or legal entities, such as the Federal Communications Commission (FCC), a state commission/authority, or state and federal courts are Type 2 changes. Regulatory changes are not voluntary but are requisite to comply with newly passed legislation, regulatory requirements, or court rulings. While timely compliance is required, the systems requirements and methodology to achieve compliance are usually discretionary and within the scope of change management. Either BellSouth or a CLEC may initiate the change request. Type 2 changes may be managed using the Expedited Feature Process, as discussed in Section 4, Part 3.

Type 3 – Industry Standard Change.

Any non-Type 1 change to the interfaces between the CLEC's and BellSouth's operational support systems required to bring these interfaces in line with newly agreed upon telecommunications industry guidelines are Type 3 changes. Either BellSouth or a CLEC may initiate the change request. Type 3 changes may be managed using the Expedited Feature Process, as discussed in Section 4, Part 3.

Type 4 – BellSouth Initiated Change.

Any non-Type 1 change affecting the interfaces between the CLEC's and BellSouth's operational support systems which BellSouth desires to implement on its own accord. These changes might involve system enhancements, manual and/or business processes. These type changes might also include issues for Pre-Orders, Orders, Queries, and Maintenance Requests that can be submitted and accepted, but may require clarification. This classification does not include changes imposed

upon these interfaces by third parties such as regulatory bodies (which are Type 2 Changes) or standards organizations (which are Type 3 Changes). Type 4 changes may be managed using the Expedited Feature Process, as discussed in Section 4, Part 3.

Type 5 – CLEC Initiated Change.

Any non-Type 1 change affecting interfaces between the CLEC's and BellSouth's operational support systems which the CLEC requests BellSouth to implement is a Type 5 change. These changes might involve system enhancements, manual and/or business processes. These type changes might also include issues for Pre-Orders, Orders, Queries, and Maintenance Requests that can be submitted and accepted, but may require clarification. This classification does not include changes imposed upon these interfaces by third parties such as regulatory bodies (which are Type 2 Changes) or standards organizations (which are Type 3 Changes). Type 5 changes may be managed using the Expedited Feature Process, as discussed in Section 4, Part 3.

Type 6- CLEC Impacting Defects

A Type 6 defect request is any non-type 1 change that corrects problems discovered in production versions of an application interface. These problems are where the interface is not working in accordance to the BellSouth baseline user requirements or the business rules that BellSouth has published or otherwise provided to the CLECs. In addition, if functional requirements agreed upon by BellSouth and the CLECs, results in inoperable functionality, even though software user requirements and business rules match; this will be addressed as a defect.

These problems typically affect the CLEC's ability to exchange transactions with BellSouth and may include documentation that is in error, has missing information or is unclear in nature.

Type 6 validated defects may not be managed using the Expedited Feature Process as discussed in Section 4, Part 3.

Defect Change Requests will have three (3) Impact Levels:

- High Impact – The failure causes impairment of critical system functions and no electronic workaround solution exists.
- Medium Impact – The failure causes impairment of critical system functions, though a workaround solution does exist.
- Low Impact – The failure causes inconvenience or annoyance.

The CLEC and/or BellSouth may initiate these types of changes affecting interfaces between the CLEC's and BellSouth's operational support systems. These type changes might also include issues for Pre-Orders, Orders, Queries, and Maintenance Requests that can be submitted and accepted, but may require workarounds or clarification.

Figure 3-1 shows the top-level process that will be used to evaluate Change Requests. The BellSouth Account Team(s) will handle BFR requests and production support issues. Enhancements, defects and expedited features will be handled through the Change Control Process.

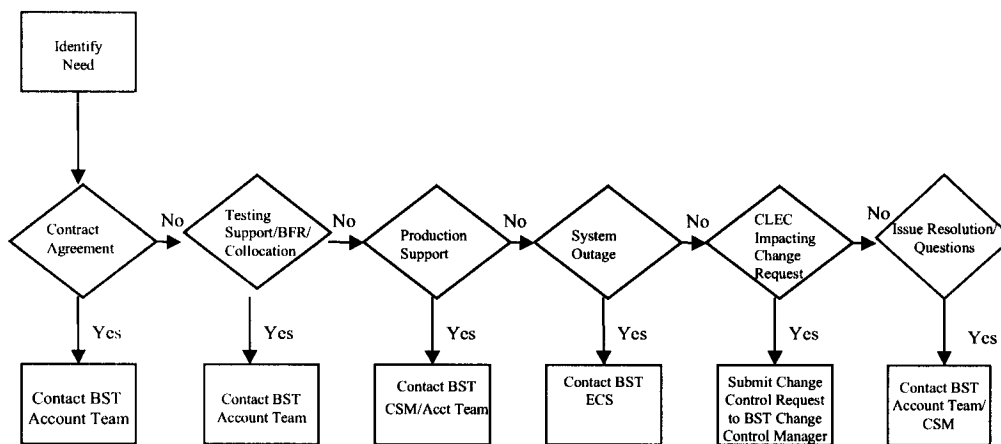


Figure 3-1. Change Control Decision Process

4.0 CHANGE CONTROL PROCESS FLOW

The following three sub-sections describe the process flows for typical Type 1 through Type 5 changes, including expedited features. Each sub-section will describe the cycle times for an activity and document accountability, sub-process activities, inputs and outputs for each step in the process. Section 5 of this document describes the process flow for Type 6 changes. Based on the categorization of the request, the following diagram will help guide a CLEC or BellSouth representative to the appropriate process flow based on Change Control Request Type:

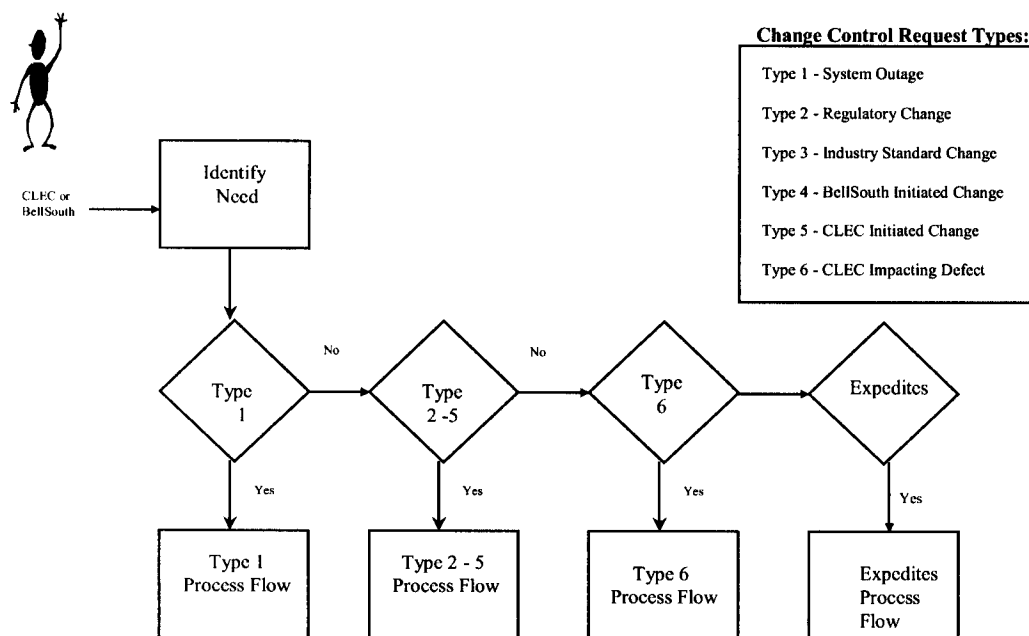


Figure 4-1. Change Control Process Flow

Part 1 - Type 1 Process Flow

Figure 4-2 provides the process flow for resolving a typical Type 1 - System Outage. The Electronic Communications Support (ECS) Group will work with the CLEC community to resolve and communicate information about system outages in a timely manner - actual cycle times are documented in table 4-1 and the sub-process steps. The ECS Helpdesk number is 888-462-8030.

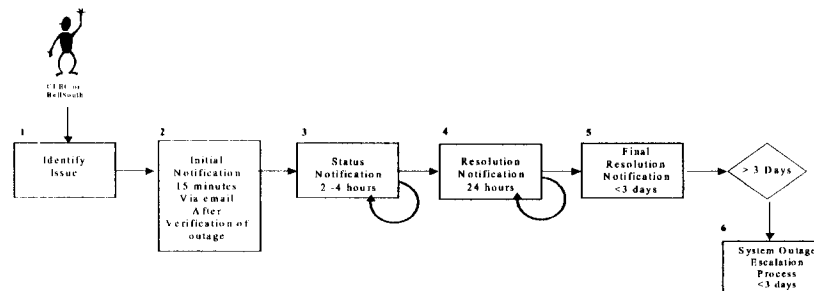


Figure: 4-2. Type 1 Process Flow

Table 4-1 describes the cycle times for each process step that is outlined in the Type 1 - System Outage Process Flow. These cycle times represent typical timeframes for completing the documented step and producing the desired output for the step. In sub-process step 2 "Initial Notification" timeframe for completing this step does not begin until after the outage has been reported. The sub-process steps 3 "Status Notification" and 4 "Resolution Notification" are iterative steps. Iterative steps will be performed one or more times until the exit criteria for that process are met. If resolution is not reached within 20 minutes, BellSouth will provide the initial notification to the CLEC community via e-mail and post outage information on the web within 15 minutes of the outage verification.

Table 4-1. Type 1 Cycle Times

Process Description	1 Identify Issue	2 Initial Notification	3 Status Notification	4 Resolution Notification	5 Final Resolution Notification	6 Escalation
Cycle Time	N/A	Via Email within 15 minutes of the outage verification. BST website will be posted with outage information.	2 - 4 hours (Iterative)	24 hours (Iterative)	< 3 days	> 3 days System Outage Escalation Process

Note: The Escalation Process may be used at any time within Steps 3-6 if cycle times are not met and/or responses are not acceptable.

The table below details the steps, accountable individuals, tasks, the inputs/outputs and the cycle time of each sub-process in the Type 1 Process Flow. This process will be used to capture and communicate system outage information, status notification(s), resolution and notification(s), and final resolution to the CLEC community. Steps shown in the table are sequential unless otherwise indicated.

Table 4-2. Type 1 Detail Process Flow

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
1	CCCM ECS	<u>IDENTIFY ISSUE:</u> <ol style="list-style-type: none"> 1. Internally determine if outage exists with BellSouth Electronic Interface. (The CLEC should perform internal outage resolution activities to determine if the potential problem involves the BellSouth Electronic Interface). 2. Call the BST Electronic Communications Support (ECS) help desk at 888-462-8030. 3. ECS and individual CLEC will determine if the problem is likely to have no impact on the industry. If there is no impact, the outage will be worked on a bilateral basis. 4. ECS will provide the CLEC with a trouble ticket number, if requested, to record and track the outage. 	<u>INPUTS:</u> <ul style="list-style-type: none"> • Issue Characteristics • Call to ECS Helpdesk <u>OUTPUTS:</u> <ul style="list-style-type: none"> • Recorded Outage 	N/A
2	ECS	<u>INITIAL NOTIFICATION:</u> <ol style="list-style-type: none"> 1. ECS will post to the Web an Initial Industry Notification that a BellSouth Electronic Interface outage has been identified. An e-mail to the CLECs participating in Change Control will also be distributed. The system ticket number of the outage will be included in the web posting and the email notification. 2. The CLEC initiating the Type 1 System Outage will need to be available for communications on an as needed basis. 	<u>INPUTS:</u> <ul style="list-style-type: none"> • Recorded Outage <u>OUTPUTS:</u> <ul style="list-style-type: none"> • Industry Notification posted on Web • E-mail to CLECs participating in Change Control 	BellSouth will provide email notification to the CLECs via Change Control of Type 1 system outages within 15 minutes of the

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		3. ECS will continue to work towards the resolution of the problem 4. If outage is resolved, this notice is the first and final notification. The process for the item has ended. Outage Information will be reported in the monthly status meeting by the BCCM.		outage verification. In addition, BellSouth will continue to post the outage information on the CCP website.
3	ECS	<u>STATUS NOTIFICATION: (ITERATIVE)</u> 1. If the outage is not resolved, ECS will continue to work towards the resolution on the problem. 2. ECS may communicate with the industry / affected parties. The following information may be discussed: <ul style="list-style-type: none"> • Clarification of outage • Current status of resolution • Agreement of resolution 3. If a resolution has not been identified continue giving status notifications to the industry and continue repeating Step 3 "Status Notification" via the web. 4. Proceed to Step 4 "Resolution Notification" when a resolution has been identified.	<u>INPUTS:</u> <ul style="list-style-type: none"> • Industry Notification posted on Web <u>OUTPUTS:</u> <ul style="list-style-type: none"> • Status Notification posted on Web • Resolution information 	2-4 hour intervals
4	ECS CCCM	<u>RESOLUTION NOTIFICATION: (ITERATIVE)</u> 1. The resolution notification is posted to the Web. 2. If the item is determined to be a defect, the CLEC that initiated the call will submit a "Change Request Form" checking the Type 6 box. 3. If the resolution is not the final resolution the process will loop back to Step 3 "Status Notification". BellSouth will continue to work towards the final resolution.	<u>INPUTS:</u> <ul style="list-style-type: none"> • Status Notification posted on Web • Resolution information <u>OUTPUTS:</u> <ul style="list-style-type: none"> • Resolution Information posted on Web • Final Resolution Information 	24 hours after reporting outage

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		4. When the final resolution has been created, proceed to Step 5 "Final Resolution Notification".		
5	ECS	<u>FINAL RESOLUTION NOTIFICATION:</u> 1. The final resolution notification is posted on the Web.	<u>INPUTS:</u> <ul style="list-style-type: none"> Final Resolution Information <u>OUTPUTS:</u> <ul style="list-style-type: none"> Final Resolution Notification 	< 3 days
6	CCCM ECS	<u>ESCALATION</u> 1. Escalation is appropriate anytime the interval exceeds the recommended guidelines for notification. 2. Refer to the Type 1 - Escalation Process documented in Section 8.	<u>INPUTS:</u> <ul style="list-style-type: none"> Information or concern relating to a Type 1 - Systems Outage <u>OUTPUTS:</u> <ul style="list-style-type: none"> Documented Escalation Escalation Response 	➤ 3 days (The Escalation Process may be used at any time within Steps 3-6 if cycle times are not met and/or responses are not acceptable.)

Part 2 – Types 2-5 Process Flow

Figure 4-3 provides the process flow for reviewing, scheduling and implementing a typical Type 2-5 Change Request. The process diagram applies to Change Requests submitted via the Change Control Process. Change Requests should be submitted to the BellSouth Change Control Manager using the standard Change Request form template. This template can be acquired on the Change Control web page. Change Requests may be submitted for interfaces that are currently being utilized, in the testing phase, or if a Letter of Intent is on file with the BCCM.

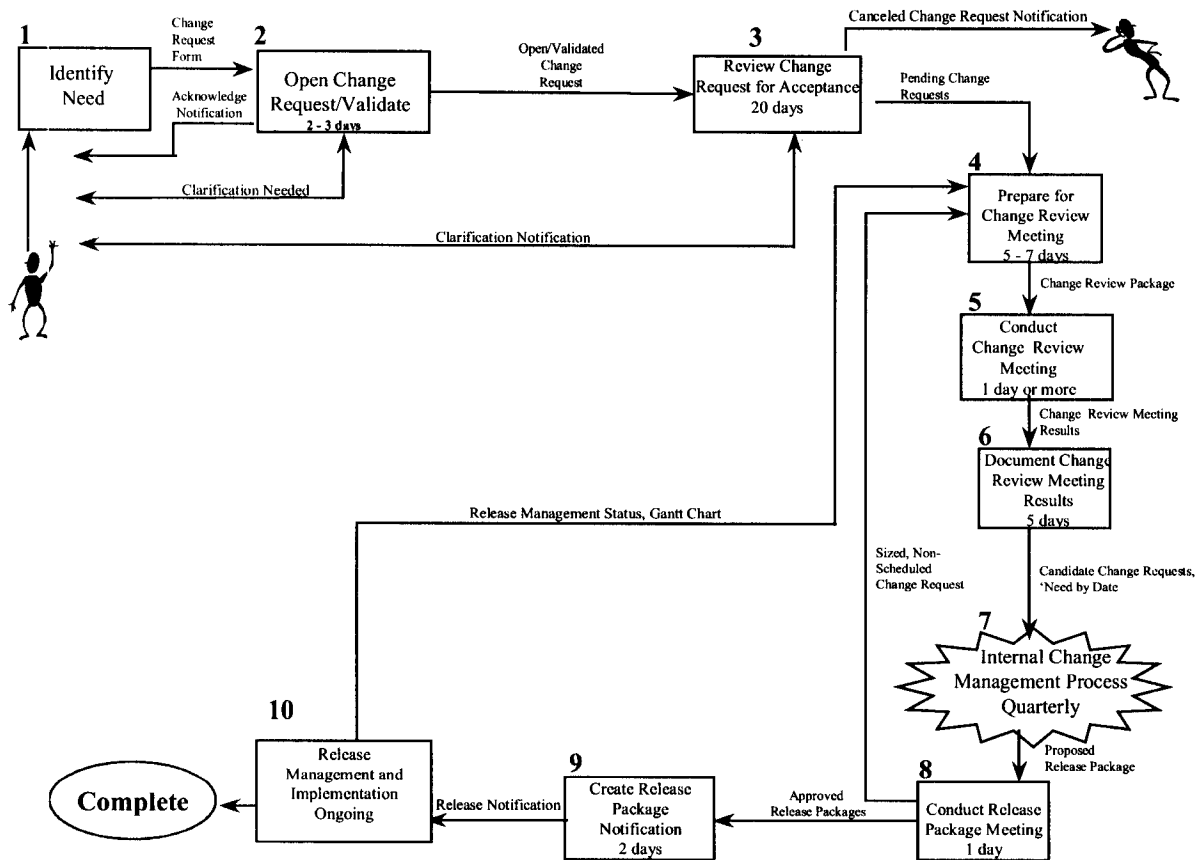


Figure 4-3. Change Control Process Flow

The table below details the steps, accountable individuals, tasks, inputs/outputs and cycle times of each sub-process in the Change Control process. This process will be used to develop Candidate Change Requests that will be used as input to the Internal Change Management Process. Steps shown in the table are sequential unless otherwise indicated.

Table 4-3. Types 2-5 Detail Process Flow

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
1	CCCM BCCM	<u>IDENTIFY NEED</u> <ol style="list-style-type: none"> Internally determine need for change request. These change requests might involve system enhancements, manual and/or business process changes. Originator and CCCM or BCCM should complete the standardized Change Request Form according to Checklist. Attach related requirements and specification documents. (See Attachment A-1A, Item 22) Appropriate CCCM/BCCM submits Change Request Form and related information via e-mail to BellSouth. 	<u>INPUTS:</u> <ul style="list-style-type: none"> Change Request Form (Attachment A-1) Change Request Form Checklist (Attachment A-1A) <u>OUTPUTS:</u> <ul style="list-style-type: none"> Completed Change Request Form with related documentation 	N/A
2	BCCM	<u>OPEN CHANGE REQUEST/VALIDATE CHANGE REQUEST FOR COMPLETENESS</u> <ol style="list-style-type: none"> Log Request in Change Request Log. Send Acknowledgement Notification (Attachment A-3) via e-mail to originator. Establish request status ('N' for New Request) Review change request for mandatory fields using the Change Request Form Checklist. Verify Change Request specifications and related information exists. Send Clarification Notification via email to the originator (Attachment A-4) if needed. Update Change Request Status to "PC" for Pending Clarification if clarification is needed. <u>CLEC or BellSouth Originator</u>	<u>INPUTS:</u> <ul style="list-style-type: none"> Completed Change Request Form with related documentation Change Request Form Checklist Change Request Clarification Response <u>OUTPUTS:</u> <ul style="list-style-type: none"> New Change Request Acknowledgment Notification Validated Change Request Clarification Notification Industry Notification via e-mail and web posting 	2-3 Bus Days Clarification times would be in addition to cycle time.

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		If clarification is needed, make necessary corrections per Clarification Notification and submit Change Request Clarification Response (Attachment A-2).		
3	BCCM	<p><u>REVIEW CHANGE REQUEST FOR ACCEPTANCE</u></p> <ol style="list-style-type: none"> 1. Review Change Request and related information for content. 2. Change Request reviewed for impacted areas (i.e., system, manual process, documentation) and adverse impacts. 3. Determine status of request: <ul style="list-style-type: none"> • If change already exists or is a CLEC training issue, forward Cancellation Notification (Attachment A-3) to CCCM or BCCM and update status to 'C' for Request Canceled or 'CT' for Training. If Training issue, refer to CSM or Account Team. • If Change Request Clarification Notification not received, validate with CLEC that change request is no longer needed. • If request is accepted, update Change Request status to "P" for pending in Change Request Log. <p>NOTE: See Section 11.0 Terms and Definitions – Change Request Status for valid status codes and descriptions.</p> <p>BellSouth may determine that a CLEC initiated change request cannot be accepted because of cost, industry direction or because it is considered not technically feasible to implement. If requested, the appropriate BellSouth SME will participate in the Monthly Status Meeting to address the reason for rejection and discuss alternatives with the CLEC community. The SME must be provided a minimum of two-week advance notice to participate in the upcoming Monthly Status Meeting.</p> <p><u>OBF Issues</u></p>	<p><u>INPUTS:</u></p> <ul style="list-style-type: none"> • New Change Request • Validated Change Request • Clarification Notification (if required) <p><u>OUTPUTS:</u></p> <ul style="list-style-type: none"> • Pending Change Request • Clarification Notification (if required) • Cancellation Notification (if required) • CR status updated on web 	20 Bus Days

Step	Accountability	<u>Sub-processes</u> Activities	Inputs and Outputs	Cycle Time
		All change requests that are being actively discussed at OBF, or are on the agenda to be discussed, will be deferred. If the issue is not active and will not be considered within the next six (6) months, and there is agreement between BellSouth and affected CLECs to proceed prior to an OBF resolution, BellSouth will determine if it can support the request.		
4	BCCM CCCM	<p><u>PREPARE FOR CHANGE REVIEW MEETING</u></p> <p>NOTE: These activities take place to prepare for Change review meetings when prioritizations take place.</p> <p><u>BCCM</u></p> <ol style="list-style-type: none"> 1. Prepare an agenda. 2. Make meeting preparations. 3. Update Change Request Log with current status for new and existing Change Requests. 4. Prepare and post Change Request Log to web. 5. Provide preliminary size and scope information on each pending change request to CLECs. <p><u>CCCM</u></p> <ol style="list-style-type: none"> 1. Analyze Pending Change Requests. 2. Determine priorities for change requests and establish "Desired/Want" dates. 3. Create draft Priority List to prepare for Change Review meeting. <p>The sizing information provided with the Change Review Meeting package is a preliminary estimate of the work effort. After prioritization, each interface is assessed in depth to determine the scope of the change request. Based on the assessment, an adjustment in the sizing may be required.</p>	<p><u>INPUTS:</u></p> <ul style="list-style-type: none"> • Pending Change Request Notifications • Project Release Status (Step 10) • Change Request Log <p><u>OUTPUTS:</u></p> <ul style="list-style-type: none"> • Change Request Log • CLEC Draft Priority List • Preliminary size and scope on each Pending change request 	5-7 Bus Days
5	BCCM	<p><u>CONDUCT CHANGE REVIEW MEETING</u></p>	<p><u>INPUTS:</u></p> <ul style="list-style-type: none"> • Change Request Log 	1 Bus Day

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
	CCCM	<p><u>Monthly Status Meetings</u></p> <ol style="list-style-type: none"> 1. Communicate regulatory mandates. 2. Review status of pending/approved Change Requests (including defects and expedited features) at monthly status meeting. 3. Review current Release Management statuses. 4. Review issues and action items and assign owners. 5. Present new change requests submitted since previous Monthly Status Meeting. <p><u>Prioritization Meetings (held quarterly in March, June, September and December)</u></p> <ol style="list-style-type: none"> 1. Follow Steps 1-3 from Monthly Status Meetings. 2. Initiators present Change Requests. 3. BellSouth presents the preliminary size and scope of each change request. BellSouth presents the number of major releases and dates targeted for the next 12 months. 4. Discuss impacts. 5. Prioritize Change Requests. 6. Develop final Candidate Requests list of Pending Change Requests by category, 'Need by Dates' and prioritized Change Requests. 7. Update Change Request Log to 'RC' for Candidate Request List, 'C' for Canceled, 'P' for Pending, as appropriate. 8. Review issues and action items and assign owners. 	<ul style="list-style-type: none"> • CLEC Draft Priority List • Desired/Want Dates • Impact analysis • Preliminary size and scope on each pending change request <p><u>OUTPUTS:</u></p> <ul style="list-style-type: none"> • Meeting minutes • Updated Change Request Log • Candidate Change Request List • Issues and Actions Items (if required) 	<p>(or as needed based on volume)</p> <p>Meeting Day</p>
6	BCCM	<p><u>DOCUMENT CHANGE REVIEW MEETING RESULTS</u></p> <ol style="list-style-type: none"> 1. Prepare and distribute outputs from Step 5. 	<p><u>INPUTS:</u></p> <ul style="list-style-type: none"> • Change Request Log • Final Candidate Request List <p><u>OUTPUTS:</u></p>	5 Bus Days

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
			<ul style="list-style-type: none"> Updated Change Request Log Web posting of meeting output 	
7	BCCM CCCM	<u>INTERNAL CHANGE MANAGEMENT PROCESS</u> <ol style="list-style-type: none"> Both BellSouth and CLECs will perform analysis, impact, sizing and estimating activities to the Candidate Change Requests. This ensures that participating parties are reviewing capacity and impacts to schedules before assigning resources to activities. Sizing and sequencing of prioritized change requests will begin with the top priority items and continue down through the list until the capacity constraints have been reached for the next release. 	<u>INPUTS:</u> <ul style="list-style-type: none"> Candidate Change Request List with agreed upon 'Need by Dates' Change Request Log <u>OUTPUTS:</u> <ul style="list-style-type: none"> BellSouth's Proposed Release Package CLEC analysis 	Quarterly – (based on Release Schedule)
8	BCCM CCCM	<u>CONDUCT RELEASE PACKAGE MEETING</u> <ol style="list-style-type: none"> Prepare agenda. Make meeting preparations. Evaluate proposed release schedule. One CCP master prioritization list will be maintained. One month prior to each Change Review Meeting, CLEC/BST will determine the process for prioritizing change requests. Options include: <ul style="list-style-type: none"> Prioritize all change requests (new pending and non-scheduled) Prioritize only the new pending requests. An average ranking will be calculated and incorporated into the CCP master prioritization list. Based on BST/CLEC consensus create the Approved Release Package. CLECs, based on group consensus, may request changes to the proposed scope (like for like-size CRs). BellSouth will evaluate and determine the impacts of the 	<u>INPUTS:</u> <ul style="list-style-type: none"> BellSouth's Proposed Release Package BellSouth's Release Schedule Change Request Log CLEC Analysis <u>OUTPUTS:</u> <ul style="list-style-type: none"> Approved Release Package Updated Change Request Log Meeting Minutes Scheduled Change Requests Non-scheduled change requests (return to Step 4) Date for initial Release Management Project Meeting for next new release. 	1 Bus Day Major Release Meeting held 36 weeks prior to production Minor Release meeting held 19 weeks prior to production (if applicable)

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		requests changes and re-present the proposed package to the CLEC community. CLEC/BST consensus will be used to create the Approved Release Package. 6. Identify Release Management Project Manager, if possible. 7. Establish date for initial Release Management Project Meeting for the next new release. 8. All Change Requests that are in the approved scheduled release will be changed to "S" status for "Scheduled".		
9	BCCM	<u>CREATE RELEASE PACKAGE NOTIFICATION</u> 1. Develop and distribute Release Notification Package via web.	<u>INPUTS:</u> • Approved Release Package <u>OUTPUTS:</u> • Release Package Notification	2 Bus Days after Release Package Mtg.
10	BCCM (Project Managers from each participating company)	<u>RELEASE MANAGEMENT AND IMPLEMENTATION</u> 1. Provide Project Management and Implementation of Release (See Release Management @ Appendix B). 2. Lead Project Manager communicates Release Management Project status to BCCM for inclusion in Monthly Status Meetings. 3. Software Release Notifications will be provided 30 calendar days or more in advance of the implementation date. 4. BellSouth User Requirements for software changes will be presented to CLECs. If needed, changes will be incorporated and requirements re-baselined. <u>Major Releases</u> • Draft User Requirements for major software releases will be provided to the CLECs at least 36 weeks prior to production. • Final User Requirements for major software releases will be provided to the CLECs at least	<u>INPUTS:</u> • Approved Release Package Notification <u>OUTPUTS:</u> • Project Release Status • Implementation Date • Project Plan, Work Breakdown Schedule, Risk Assessment, Executive Summary, etc • Implemented Change Request • Draft User Requirements • Final User Requirements • Documentation Changes • Final Specifications	Ongoing

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		<p>34 weeks prior to production.</p> <ul style="list-style-type: none"> • Final specifications (EDI specs and TAG API) for major software releases will be provided to the CLECs at least 10 weeks prior to production. • The business rules associated with major software releases will be provided to the CLECs at least 8 weeks prior to production. <p><u>Industry Releases</u></p> <ul style="list-style-type: none"> • Notification for the implementation of an Industry release will be provided at least 42 weeks prior to production. • Draft User requirements for the implementation of an Industry Release will be provided to CLECs at least 40 weeks prior to production. • Final User requirements for the implementation of an Industry release will be provided to CLECs at least 35 weeks prior to production. • Final specifications (EDI specs and TAG API) for the implementation of an Industry release will be provided to the CLECs at least 10 weeks prior to production. • Business rules associated with the implementation of an Industry release will be provided to CLECs at least 8 weeks prior to production. <p><u>Minor Releases</u></p> <ul style="list-style-type: none"> • Draft User requirements for the implementation of a Minor release will be provided to CLECs at least 19 weeks prior to production (if applicable). • Final user requirements for the implementation of a Minor release will be provided to CLECs at least 18 weeks prior to 		

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		<p>production (if applicable).</p> <ul style="list-style-type: none"> • Final specifications (EDI specs and TAG API) for minor software releases will be provided to the CLECs at least 5 weeks prior to production (if applicable). • The business rules associated with minor releases will be provided to the CLECs at least 5 weeks prior to production (if applicable). <p>5. BellSouth Documentation changes, including business rule changes, will be provided.</p> <ul style="list-style-type: none"> • All non-system impacting changes to BellSouth business rule documentation will be provided to CLECs at least 30 calendar days in advance of the effective date (excluding expedites/defects). <p>6. Once a Change Request is implemented in a release, the status will be changed to "I" for Change Implemented.</p>		

Part 3 – Expedited Feature Process

An Expedited Feature is the inability for a CLEC to process certain types of LSR's based on the existing functionality to BellSouth's Operational Support Systems (OSS's) that are in the scope of CCP. The change request for an expedite must provide details of the business impact and will fall into one of two categories:

- A submitted defect that has been re-classified as a feature where the CLEC/BellSouth has determined should be expedited due to impact
- An ordering enhancement to an existing interface where the CLEC/BellSouth has determined should be expedited due to impact

Re-classified Defects

When a submitted defect is re-classified as a feature, the CLEC/BellSouth will be notified by Change Control in the defect validation. The CLEC will have the ability to ask BellSouth to expedite the reclassified feature by updating the Change request, marking it as an expedite and sending back to Change Control. The change request will then follow through the Types 2-5 Expedited Feature process using agreed upon intervals.

Ordering enhancement to an existing interface

A CLEC/BellSouth will also have the ability to submit a Type 2-5 change request as an expedited feature request for an ordering enhancement to an existing interface where the functionality does not currently exist in BellSouth's offered interfaces.

For both re-classified defects and enhancements to an existing interface, the rules surrounding the expedited feature request will be:

- Must be an ordering enhancement to an existing interface
- Will follow the Expedited Feature Process flow described below which is based on the current Types 2-5 process flow using agreed upon intervals with the exception of Steps 4-6 which are eliminated.
- The CLEC/BellSouth will be required to give impacts and the consequences for not implementing the feature in the current, next, or minor release, best effort.

Figure 4.4 provides the process flow for the expedited feature process.

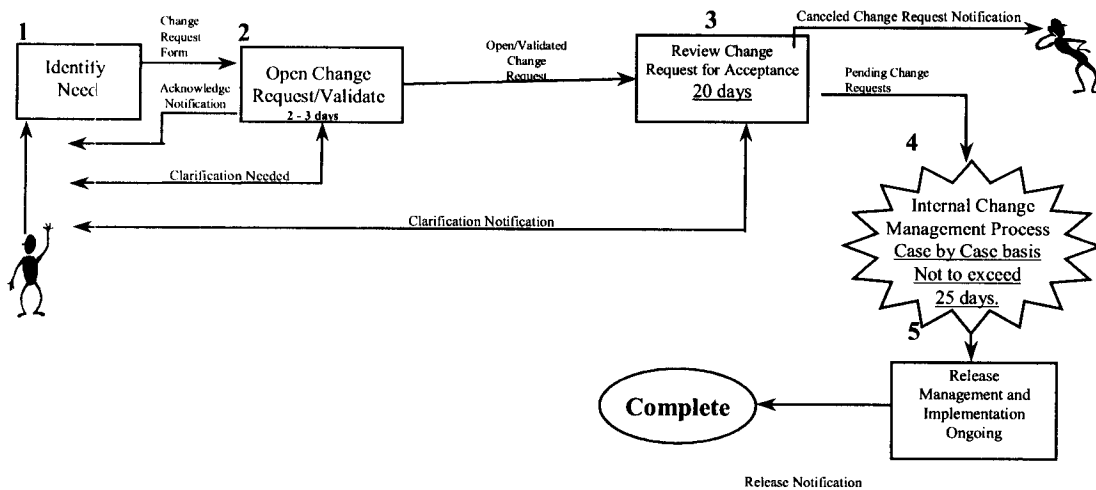


Figure 4.4 – Process Flow for Types 2-5 Expedited Feature Process

The table below details the steps, accountable individuals, tasks, inputs/outputs and cycle times of each sub-process in the Expedited Feature process. Steps shown in the table are sequential unless otherwise indicated.

Table 4-3. Types 2-5 Expedited Feature Detail Process Flow

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
1	CCCM BCCM	<u>IDENTIFY NEED</u> <ol style="list-style-type: none"> Internally determine need for change request. These change requests might involve system enhancements, manual and/or business process changes. Originator and CCCM or BCCM should complete the standardized Change Request Form according to Checklist. Attach related requirements and Attachment A-1A, Item 22. Appropriate CCCM/BCCM submits Change Request Form and related information via e-mail to BellSouth. 	<u>INPUTS:</u> <ul style="list-style-type: none"> Change Request Form (Attachment A-1) Change Request Form Checklist (Attachment A-1A) <u>OUTPUTS:</u> <ul style="list-style-type: none"> Completed Change Request Form with related documentation 	N/A
2	BCCM	<u>OPEN CHANGE REQUEST/VALIDATE CHANGE REQUEST FOR COMPLETENESS</u> <ol style="list-style-type: none"> Log Request in Change Request Log. Send Acknowledgement Notification (Attachment A-3) via e-mail to originator. Establish request status ('N' for New Request) Review change request for mandatory fields using the Change Request Form Checklist. Verify Change Request specifications and related information exists. Send Clarification Notification via email to the originator (Attachment A-4) if needed. Update Change Request Status to "PC" for Pending Clarification if clarification is needed. <u>CLEC or BellSouth Originator</u> If clarification is needed, make necessary corrections per Clarification Notification and submit Change Request Clarification Response (Attachment A-2).	<u>INPUTS:</u> <ul style="list-style-type: none"> Completed Change Request Form with related documentation Change Request Form Checklist Change Request Clarification Response <u>OUTPUTS:</u> <ul style="list-style-type: none"> New Change Request Acknowledgment Notification Validated Change Request Clarification Notification Industry Notification via e-mail and web posting 	1 Bus Day Clarification times would be in addition to cycle time.

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
3	BCCM	<p><u>REVIEW CHANGE REQUEST FOR ACCEPTANCE</u></p> <ol style="list-style-type: none"> 1. Review Change Request and related information for content. 2. Change Request reviewed for impacted area (i.e., system, manual process, documentation) and adverse impacts. 3. Determine status of request: <ul style="list-style-type: none"> • If change already exists or CLEC training issue, forward Cancellation Notification (Attachment A-3) to CCCM or BCCM and update status to 'C' for Request Canceled or 'CT' for Training. If Training issue, refer to CSM or Account Team. • If Change Request Clarification Notification not received, validate with CLEC that change request is no longer needed. • If request is accepted, update Change Request status to "P" for Pending in Change Request Log. • If request does not meet the expedited feature criteria, it will exit this process and enter the standard Types 2-5 flow, Step 4. <p>NOTE: See Section 11.0 Terms and Definitions – Change Request Status for valid status codes and descriptions.</p> <p>BellSouth may determine that a CLEC initiated expedited change request cannot be accepted because of cost, industry direction or because it is considered not technically feasible to implement. If requested, the appropriate BellSouth SME will participate in the Monthly Status Meeting to address the reason for rejection and discuss alternatives with the CLEC community. The SME must be provided a minimum of two-week advance notice to participate in the upcoming Monthly Status meeting.</p>	<p><u>INPUTS:</u></p> <ul style="list-style-type: none"> • New Change Request • Validated Change Request • Clarification Notification (if required) <p><u>OUTPUTS:</u></p> <ul style="list-style-type: none"> • Validated Expedited Change Request • Clarification Notification (if required) • Cancellation Notification (if required) • CR status updated on web 	20 Bus Days

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
4	BCCM CCCM	<p><u>INTERNAL CHANGE MANAGEMENT PROCESS</u></p> <ol style="list-style-type: none"> Both BellSouth and CLECs will perform analysis, impact, sizing and estimating activities to the Expedited Feature Change Request. This ensures that participating parties are reviewing capacity and impacts to schedules before assigning resources to activities. <p>Expedited Features will be implemented in the current, next release, or minor release, best effort.</p>	<p><u>INPUTS:</u></p> <ul style="list-style-type: none"> Change Request Log <p><u>OUTPUTS:</u></p> <ul style="list-style-type: none"> Release Date for Expedited Feature 	Case by case basis – not to exceed 25 days
5	BCCM (Project Managers from each participating company)	<p><u>RELEASE MANAGEMENT AND IMPLEMENTATION</u></p> <ol style="list-style-type: none"> Provide Project Management and Implementation of Release (See Release Management @ Appendix B). Lead Project Manager communicates Release Management Project status to BCCM for inclusion in Monthly Status Meetings. BellSouth User Requirements for software changes will be presented to CLECs, if applicable. If needed, changes will be incorporated and requirements re-baselined. BellSouth Documentation changes, including business rules changes associated with expedited features, will be provided, if applicable. Once a Change Request is implemented in a release, the status will be changed to “I” for Change Implemented. 	<p><u>INPUTS:</u></p> <ul style="list-style-type: none"> Approved Release Package Notification <p><u>OUTPUTS:</u></p> <ul style="list-style-type: none"> Project Release Status Implementation Date Documentation Changes 	Ongoing

5.0 DEFECT PROCESS

A CLEC/BST identified defect will enter this process through the Change Management Team as a Type 6 Change Request. If the defect is validated internally, it will route through this process, and notification provided to the CLEC community via e-mail and web posting.

A Type 6 defect request is any non-type 1 change that corrects problems discovered in production versions of an application interface. These problems are where the interface is not working in accordance to the BellSouth baseline user requirements or the business rules that BellSouth has published or otherwise provided to the CLECs.

In addition, if functional requirements agreed upon by BellSouth and the CLECs, results in inoperable functionality, even though software user requirements and business rules match; this will be addressed as a defect.

These problems typically affect the CLEC's ability to exchange transactions with BellSouth and may include documentation that is in error, has missing information or is unclear in nature (See Documentation Defect – Sub section 5-2). Type 6 validated defects may not be managed using the Expedited Feature Process discussed in Section 4, Part 3.

Defect Change Requests will have three (3) Impact Levels (excluding documentation defects):

- **High Impact**

The failure causes impairment of critical system functions and no electronic workaround solution exists.

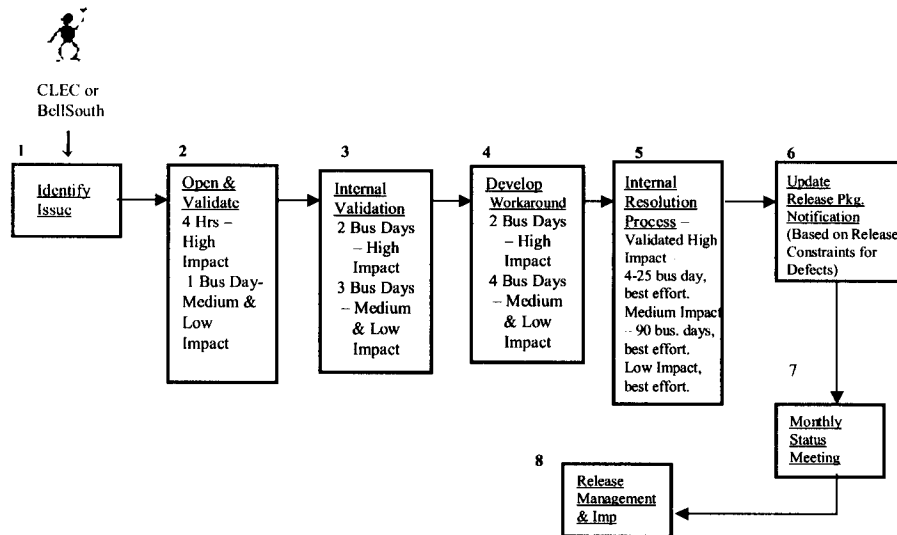
- **Medium Impact**

The failure causes impairment of critical system functions, though a workaround solution does exist.

- **Low Impact**

The failure causes inconvenience or annoyance.

Figure 5-1 provides the process flow for the validation and resolution of a Type 6 Change – CLEC Impacting Defect (excluding documentation).



NOTE: The intervals in the boxes above match the intervals in the tables below for High, Medium, and Low Impact defect change requests.

Figure 5-1. Type 6 Process Flow

The table below details the steps, accountable individuals, tasks, inputs/outputs and cycle times of each sub-process in the Type 6 Process Flow. This process will be used to validate defects, provide status notification(s), workarounds and final resolution to the CLEC community. Steps shown in the table are sequential unless otherwise indicated. (This table excludes documentation defects which are detailed in a separate section 5.2)

Table 5-1. Type 6 Detail Process Flow

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
1	CCCM BCCM	<u>IDENTIFY NEED</u> <ol style="list-style-type: none"> 1. Identify Defect. 2. Originator and CCCM or BCCM should complete the standardized Change Request Form indicating that it is a Type 6. 3. Include description of business need and details of business impact. 4. Attach related requirements and specification documents. These attachments must include the following, if appropriate: <ul style="list-style-type: none"> • PON • OCN • Specific Scenario • Interface(s) affected • Error message (if applicable) • Release or API version (if applicable) 5. Appropriate CCCM/BCCM submits Change Request Form and related information via e-mail to BellSouth Change Management Team. 	<u>INPUTS:</u> <ul style="list-style-type: none"> • Type 6 Change Request <u>OUTPUTS:</u> <ul style="list-style-type: none"> • Completed Change Request Form (with related documentation if necessary) 	N/A
2	BCCM	<u>OPEN & VALIDATE DEFECT FORM FOR COMPLETENESS</u> <ol style="list-style-type: none"> 1. Log Defect in Change Request Log. 2. Send Acknowledgment Notification via email to initiating CLEC. 3. Establish CR status ('N' for New Defect). 4. BCCM reviews change request for mandatory fields using the Change 	<u>INPUTS:</u> <ul style="list-style-type: none"> • Completed Change Request Form (with related documentation if necessary) <u>OUTPUTS:</u> <ul style="list-style-type: none"> • New Defect • Acknowledgment Notification 	4 Hours – High Impact 1 Bus Day – Medium & Low Impact (Time to be calculated)

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		<p>mandatory fields using the Change Request Form Checklist.</p> <ol style="list-style-type: none"> Verify specifications and related information exists. Send Clarification Notification via email to the originator if needed. Update CR Status to 'PC' for Pending Clarification if clarification is needed. <p>If clarification is needed, CLEC or BST originator makes necessary corrections per Clarification Notification and submits via email Change Request Clarification Response.</p>	<ul style="list-style-type: none"> Clarification Notification (if required) 	from time of receipt with a cutoff time of 4:00 PM Eastern Time)
3	BCCM	<p>INTERNAL VALIDATION</p> <ol style="list-style-type: none"> Validate that it is a defect. Perform internal defect analysis. <u>Determine status of request:</u> <ul style="list-style-type: none"> If change already exists or CLEC training issue forward Cancellation Notification to CCCM or BCCM and update status to 'C' for Request Cancelled or 'CT' for Training. If Training issue, refer to CSM or Account Team. <ul style="list-style-type: none"> Send Clarification Notification via email if needed and update status to 'PC' for Pending Clarification. If Change Request Clarification Notification not received, validate with CLEC that change request is no longer needed. If request is valid, update Change Request status to 'V' for Validated Defect and indicate appropriate Impact Level. If CLEC does not agree with the validation, the CLEC may appeal the issue or escalate. Based on detail analysis, BellSouth will reaffirm the impact level that is stated on the request. If the process is operating as specified in the baselined requirements and published 	<p>INPUTS:</p> <ul style="list-style-type: none"> New Defect <p>OUTPUTS:</p> <ul style="list-style-type: none"> Validated Defect Defect notification to CLEC community via e-mail and web posting Clarification Notification (if required) Cancellation Notification (if required) Status provided for High Impact Defects to originator via email within 24 hours. 	<p>2 Bus Days – High Impact</p> <p>3 Bus Days – Medium & Low Impact</p>

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		<p>business rules, the BCCM will communicate the results via e-mail to the originator to discuss/determine the next step(s).</p> <ul style="list-style-type: none"> If issue is re-classified as a feature change, provide supporting information via email to the originator for review and feedback. The Change Request will exit the defect process flow and enter Types 2-5 process flow (enter at Step 3). <p>NOTE: See Section 11.0 Terms and Definitions – Defect Status for valid status codes and descriptions.</p> <p>Defect notification will be provided to CLEC community via e-mail and web posting.</p>		
4	BCCM	<p><u>DEVELOP AND VALIDATE WORKAROUND (IF APPLICABLE)</u></p> <ol style="list-style-type: none"> Defect workaround identified. Change Request status changed to “W” for workaround identified. Workaround is communicated via e-mail to originating CLEC and to the CLEC community via email and web posting. If appropriate, communication to the CLEC community regarding workaround will be discussed via conference call. <p>If it is determined that additional time is needed to develop workaround due to the complexity of the defect, notification will be provided to CLEC community via e-mail and web posting.</p>	<p><u>INPUTS:</u></p> <ul style="list-style-type: none"> Validated Defect Clarification Notification (if required) <p><u>OUTPUTS:</u></p> <ul style="list-style-type: none"> Workaround (if applicable) Clarification Notification (if required) Cancellation Notification (if required) E-mail and web posting of workaround 	<p>2 Bus Days – High Impact</p> <p>4 Bus Days – Medium & Low Impact</p>
5	BCCM	<p><u>INTERNAL RESOLUTION PROCESS</u></p> <ol style="list-style-type: none"> Schedule and evaluate Defects based on capacity and business impacts to the CLECs and BellSouth. 	<p><u>INPUTS:</u></p> <ul style="list-style-type: none"> CLEC/ BST input <p><u>OUTPUTS:</u></p>	<p>Validated High Impact Defects will be implemented within a 4-25</p>

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		2. Provide status updates to the CLEC community via email as the status changes until the defect is implemented.	<ul style="list-style-type: none"> Defect Release Schedule 	<p>within a 4-25 business day range, best effort.</p> <p>Medium Impact Defects will be implemented within 90 bus days, best effort.</p> <p>Low Impact Defects will be implemented best effort.</p>
6	BCCM	<p><u>UPDATE RELEASE PACKAGE NOTIFICATION</u></p> <ol style="list-style-type: none"> Update and distribute release notification package via web. All Change Requests that are in the approved scheduled release will be changed to "S" status for "Scheduled". <p>Note: The release notification will be published in a timely manner, based on the release constraints associated with the defect.</p>	<p><u>INPUTS:</u></p> <ul style="list-style-type: none"> Defect Information <p><u>OUTPUTS:</u></p> <ul style="list-style-type: none"> Updated Release Package Notification Scheduled Change Request 	Based on release constraints for defects (may be less than 30 days).
7	BCCM	<p><u>MONTHLY STATUS MEETING</u></p> <ol style="list-style-type: none"> Provide status of Defect. Solicit CLEC/ BST input. Update Defect information as needed. 	<p><u>INPUTS:</u></p> <ul style="list-style-type: none"> Defects Received Change Request Log Defect Analysis Workaround (if applicable) <p><u>OUTPUTS:</u></p> <ul style="list-style-type: none"> Updated status Updated Change Request 	Monthly or when status changes, whichever occurs first.

Step	Accountability	<u>Sub-processes</u> Activities	Inputs and Outputs	Cycle Time
			Log • Meeting minutes	
8	BCCM	<p><u>RELEASE MANAGEMENT AND IMPLEMENTATION</u></p> <p>The following release management activities will pertain to Type 6 changes:</p> <ol style="list-style-type: none"> 1. Lead project manager communicates release management project status to BCCM for inclusion in Monthly status meetings. 2. Once a defect is implemented in a release, the status will be changed to "I" for Change Implemented. 	<p><u>INPUTS:</u></p> <ul style="list-style-type: none"> • Approved Release Package Notification <p><u>OUTPUTS:</u></p> <ul style="list-style-type: none"> • Project Release Status • Implementation Date • Implemented Change Request 	Ongoing

Table 5-2. Type 6 Detail Process Flow – Documentation Defects

The table below details the steps, accountable individuals, tasks, inputs/outputs and cycle times of each sub-process in the Type 6 Process Flow for documentation defects. This process will be used to validate documentation defects, provide status notification(s), and final resolution to the CLEC community. Steps shown in the table are sequential unless otherwise indicated.

Step	Accountability	<u>Sub-processes</u> Activities	Inputs and Outputs	Cycle Time
1	CCCM BCCM	<p><u>IDENTIFY NEED</u></p> <ol style="list-style-type: none"> 1. Identify Documentation Defect. 2. Originator and CCCM or BCCM should complete the standardized Change Request Form indicating that it is a Type 6. 3. Include description of business need and details of business impact. 4. Attach related requirements and specification documents, if appropriate. 5. Appropriate CCCM/BCCM submits Change Request Form and related information via e-mail to BellSouth Change Management Team. 	<p><u>INPUTS:</u></p> <ul style="list-style-type: none"> • Type 6 Change Request <p><u>OUTPUTS:</u></p> <ul style="list-style-type: none"> • Completed Change Request Form (with related documentation if necessary) 	N/A

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
2	BCCM	<u>OPEN & VALIDATE DEFECT FORM FOR COMPLETENESS</u> <ol style="list-style-type: none"> Log Defect in Change Request Log. Send Acknowledgment Notification via email to initiating CLEC. Establish CR status ('N' for New Defect) BCCM reviews change request for mandatory fields using the Change Request Form Checklist. Verify specifications and related information exists. 	<u>INPUTS:</u> <ul style="list-style-type: none"> Completed Change Request Form (with related documentation if necessary) <u>OUTPUTS:</u> <ul style="list-style-type: none"> New Documentation Defect Acknowledgment Notification Clarification Notification (if required) 	1 Bus Day
3	BCCM	<u>INTERNAL VALIDATION</u> <ol style="list-style-type: none"> Validate that it is a documentation defect. Perform internal defect analysis. Determine status of request: <ul style="list-style-type: none"> If change already exists or CLEC training issue, forward Cancellation Notification (Attachment A-3) to CCCM or BCCM and update status to 'C' for Request Canceled or 'CT' for Training. If Training issue, refer to CSM or Account Team. <ul style="list-style-type: none"> Send Clarification Notification via email if needed and update status to 'PC' for Pending Clarification. If Change Request Clarification Notification not received back from CLEC, validate with CLEC that change request is no longer needed. If request is valid, update Change Request status to 'V' for Validated Defect and indicate appropriate Impact Level. If CLEC does not agree with the validation, the CLEC may appeal the issue or escalate. Based on detail analysis, BellSouth will reaffirm the impact level that is stated on the request. <ul style="list-style-type: none"> If the documentation is correct, the BCCM will communicate the 	<u>INPUTS:</u> <ul style="list-style-type: none"> New Documentation Defect <u>OUTPUTS:</u> <ul style="list-style-type: none"> Validated Documentation Defect Defect notification to CLEC community via e-mail and web posting Clarification Notification (if required) Cancellation Notification (if required) 	3 Bus Days

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		<p>results via e-mail to the originator to discuss/determine the next step(s).</p> <p>NOTE: See Section 11.0 Terms and Definitions – Defect Status for valid status codes and descriptions.</p> <p>Defect notifications will be provided to CLEC community via e-mail and web posting.</p>		
4	BCCM	<p><u>DEVELOP AND PROVIDE CARRIER NOTIFICATION “SUMMARY OF CHANGES”</u></p> <ol style="list-style-type: none"> 1. BellSouth prepares and validates the corrected documentation. 2. Carrier Notification “Summary of Changes” is developed. 3. Change Request status changed to “S” for scheduled. 4. Carrier Notification “Summary of Changes” is sent to B CCM via email for distribution to CLECs. <p>If it is determined that additional time is needed to develop workaround due to the complexity of the defect, notification will be provided to CLEC community via e-mail and web posting.</p>	<p><u>INPUTS:</u></p> <ul style="list-style-type: none"> Validated Documentation Defect Clarification Notification (if required) <p><u>OUTPUTS:</u></p> <ul style="list-style-type: none"> Workaround (if applicable) Clarification Notification (if required) Cancellation Notification (if required) E-mail of “Summary of Changes” notification 	4 Bus Days
5	BCCM	<p><u>CARRIER NOTIFICATION LETTER</u></p> <ol style="list-style-type: none"> 1. BellSouth will develop an “official” Carrier Notification Letter. 2. Carrier Notification Letter is posted to the web. 	<p><u>INPUTS:</u></p> <ul style="list-style-type: none"> Carrier Notification “Summary of Changes” <p><u>OUTPUTS:</u></p> <ul style="list-style-type: none"> Carrier Notification Letter posted on web 	10 Bus Days

6.0 CHANGE REVIEW – PRIORITIZATION – RELEASE PACKAGE DEVELOPMENT & APPROVAL

Part 1 – Change Review Meeting

The Change Review meeting provides the forum for reviewing and prioritizing Pending Change Requests, generating Candidate Change Requests, submitting Candidate Change Requests for sizing, and reviewing the status of all release projects underway. Status update meetings will be held monthly and are open to all CLEC's. Meetings will be structured according to category (pre-order/order, maintenance, manual and documentation, etc.). Prioritization meetings will be held quarterly.

During the Change Review Meeting each originator of a Change Request will be allowed 5 (five) minutes to present their Change Request. A question and answer session not to exceed 15 minutes will follow this presentation. After all presentations for a particular category are complete, the prioritization process will begin.

The Change Request Log will be distributed 5 - 7 (five to seven) business days prior to the Change Review meeting. A valid and complete Change Request must be received 30 business days prior to the Change Review Meeting. Change Requests must be accepted and in "Pending" status to be placed on the agenda for the next scheduled meeting.

Note: Status Meetings will occur monthly. Prioritization meetings will be scheduled to occur in March, June, September and December and will include the monthly status meeting agenda items.

Part 2 – Change Review Package

The Change Review Package will be distributed to all participants 5 – 7 (five to seven) business days prior to the Change Review meeting. The package will include the following:

- Meeting Notice
- Agenda
- Change Request Log (List of Change Requests to be reviewed)
- BellSouth's preliminary estimate of the size and scope of each Change Request
- Schedule of Releases
- Reference to Change Control Process on the BST website (for CLECs not familiar with the process, new CLECs or CLECs that choose to participate after the initial rollout)
- Status Reports from each of the active Release Management Project Teams

Part 3 – Prioritizing Change Requests

Prior to the Change Review Meeting, each participating CLEC should determine priorities for change requests and establish “desired/want” dates. The CLEC should use the Preliminary Priority List form as provided via the web.

Final prioritization will be determined at the Change Review meeting after presentation of the Change Requests for each category.

Prioritization Voting Rules

- CLEC must either be using an interface within a category (i.e. ordering), in the testing phase or have a letter of intent on file with the BellSouth Change Control Management Team to participate in the voting process
- One vote per CLEC, per category
- No proxy voting
- Types 3, 4 and 5 change requests will be prioritized (non-expedites)
- Each company may bring the number of participants necessary to represent their position. If the number of participants grow to be unmanageable, CLECs and BellSouth will revisit the issue of representation to apply some restrictions.
- Forced Ranking (1 to N, with 1 being the highest) will be used
- CLECs may choose to vote “no” on change requests that may potentially negatively impact its business or have little value to the CLEC. If a majority of CLECs vote “no” on any certain change request, that request will not be implemented.
- Votes will be tallied to determine order of ranking
- Changes will be ranked by category
- Manual processes and documentation will be prioritized separately; however they will need to be synchronized with the electronic interface changes
- In case of a tie, the affected Changes will be re-ranked and prioritized based on the re-ranking

Example: The top 2 Changes from high to low are E5 and E2, with E1 and E4 tied for 3rd. E1 and E4 would be re-ranked and prioritized according to the re-ranking.

Pre-Order LENS	CLEC 1	CLEC 2	CLEC 3	Total
E1	3	1	6	10
E2	3	5	1	9 (#2)
E3	1	6	5	12
E4	4	3	3	10
E5	2	2	3	7 (#1)
E6	6	3	2	11

Part 4 – Developing and Approving Release Packages

Subsequent to the Change Review Meeting, BellSouth and the CLECs will each evaluate and analyze the Candidate Change Requests in preparation for the Release Package Meeting that will be held as follows:

- Major Release – 36 weeks prior to production
- Minor Release – 19 weeks prior to production (if applicable)

Sizing and sequencing of change requests will be accomplished at the Prioritization meeting. CLECs may take into account the size and scope when prioritizing items.

During the Release Package Meeting, BellSouth will present its proposed release package for the next release. CLEC/BST consensus will be used to create the Approved Release Package. CLECs, based on group consensus, may request changes to the proposed scope (like for like-size CR's). BellSouth will evaluate and determine the impacts of the requested changes and re-present the proposed package to the CLEC community. CLEC/BST consensus will be used to create the Approved Release Package.

7.0 INTRODUCTION AND RETIREMENT OF INTERFACES

Introduction of New Interfaces

BellSouth will introduce new interfaces to the CLEC Community as part of the Change Control Process. BellSouth will seek to conform to the notification process for Type 4 (BellSouth Originated) changes as described in this document. In the event that BellSouth is forced to deviate from the Type 4 (BellSouth Originated) process for new non-impacting interface functionality, BellSouth will notify all CLECs of the deviation as promptly as possible. A description of the proposed interface will be submitted to the BCCM. The BCCM will add an agenda item to discuss the new interface at the monthly status meeting. BellSouth will be given 30-45 minutes to present information on the proposed interface. If BellSouth requests additional time for the presentation, a separate meeting will be scheduled to review the proposed interface, so that, the information can be presented in its entirety. The objective will be to identify interest in the new interface and obtain input from the CLEC community. BellSouth will provide specifications on the interface being developed to the CLEC community. As new interfaces are deployed, they will be added to the scope of this document, as appropriate, based on the use by the CLEC, and requested changes will be managed by this process.

Retirement of Interfaces

As active interfaces are retired, BellSouth will notify the CLECs through the Change Control Process and post a CLEC Notification Letter to the web six (6) months prior to the retirement of the interface. BellSouth will have the discretion to provide shorter notifications (30-60 days) on interfaces that are not actively used and/or have low volumes. BellSouth will consider a CLEC's ability to transition from an interface before it is scheduled for retirement. BellSouth will ensure that its transition to another interface does not negatively impact a CLEC's business.

BellSouth will only retire interfaces if an interface is not being used, or if BellSouth has a replacement for an interface that provides equal or better functionality for the CLEC than the existing interface.

Retirement of Versions

When software versions are retired, BellSouth will give the CLECs a 120 day notification.

A CLEC may respond to Change Control with its desire to extend a retirement date. The CLEC must explain why the scheduled retirement date is not acceptable by providing the impact to its business.

8.0 ESCALATION PROCESS

Guidelines

- The ability to escalate is left to the discretion of the CLEC based on the severity of the missed or unaccepted response/resolution.
- Escalations can involve issues related to the Change Control process itself.
- For change requests, the expectation is that escalation should occur only after normal Change Control procedures (e.g. communication timelines) have occurred per the Change Control agreement.
- Three levels of escalation will be used.
- For Type 1 issues, the escalation process is agreed to allow BellSouth a one-day turnaround for each cycle of escalation.
- For Types 2-5 issues, the escalation process is agreed to allow BellSouth a five-day turnaround for each cycle of escalation. (Excludes Expedites)
- For Type 6 High Impact Issues, the escalation process is agreed to allow BellSouth a one (1) day turnaround to provide a status for each cycle of escalation. For Type 6 Medium and Low Impact issues, the escalation process is agreed to allow BellSouth a two (2) to five (5) day turnaround to provide a status for each cycle of escalation.
- For Types 2-5 Expedite Process issues, the escalation process is agreed to allow BellSouth a three (3) day turnaround to provide a status for each cycle of escalation.
- Each level will go through the same Cycle, which is described below.
- All escalation communications may be optionally distributed by the CLEC to the industry and BellSouth Change Control e-mail unless there is a proprietary issue.

Cycle for Type 1 System Outages

Contact List for Escalation - ECS Group - Type I Changes

If the originator does not receive a call back from the EC Support Group according to the times specified in this document, they may escalate according to the following list:

Escalation Level	Name and Title	Office Number	Pager Number	Email Address
1st Level	Byron Franklin Manager - EC Support Group Interconnection Operations	205-733-5400	1-800-862-0399 PIN 17264913	Byron.Franklin@bridge.bellsouth.com
2nd Level	Bruce Smith Operations Director - EC Support Group Interconnection Operations	205-988-7211	1-800-542-3260	Bruce.Smith@bridge.bellsouth.com
3rd Level	Lynn Smith Operations AVP Interconnection Operations	205-714-0010	N/A	Lsmith12@imcingular.com Lynn.A.Smith@bridge.bellsouth.com

NOTE: If a call is escalated without first attempting to contact the ECS Helpdesk, the caller will be referred back to the ECS Helpdesk.

Escalation Cycle for Types 2-6 Change Requests

- Item must be formally escalated as an e-mail sent to the appropriate escalation level within BellSouth with a copy to the industry and BellSouth Change Control e-mail.
- Subject of e-mail must be CLEC (CLEC Name) ESCALATION-CR#, if applicable, Level of Escalation, unless it is proprietary.
- Content of e-mail must include:
 - Definition and escalation of item.
 - History of item.
 - Reason for escalation.
 - Desired outcome of CLEC.
- Impact to CLEC of not meeting the desired outcome or item remaining on current course of action as previously discussed at the Change Control Meeting for enhancements.
- Contact information for appropriate Level including Name, Title, Phone Number, and E-mail ID.
- For escalation Level 2, forward original e-mail and include any additional information including the reason that the matter could not be resolved at Level 1.
- For escalation Level 3, forward original e-mail and include any additional information including the reason that the matter could not be resolved at Levels 1 and 2.
- BellSouth will reply to escalation request with acknowledgement of receipt within 4 hrs and begin the escalation process through Level of escalation.
- The escalating CLEC should respond to BellSouth within 5 days as to whether escalation will continue or the BellSouth response has been accepted as closure to the item.
- If the BellSouth position suggests a change in the current disposition of the item (i.e., what has already been communicated to the industry), a conference call will be held within 1 business day of the BellSouth decision in order to provide industry notification with the appropriate executives.
- BellSouth will publish the outcome of the conference call to the industry via web.

- If unsatisfied with an outcome, either party can seek appropriate relief.

Contact List for Escalation - Type 2 - 6 Changes

Escalations should be made according to the following list.

Escalation Level	Name and Title	Office Number	Email Address
1st Level	Valerie Cottingham Director Change Control Process	205-321-2168	Valerie.cottingham@bridge.bellsouth.com
2nd Level	Dennis Davis Director (Encore Solution Delivery, Test Bed, User Requirements, CCP)	205-977-1103	Dennis.L.Davis@bridge.bellsouth.com
	Joy Lofton Director (for Business Rules/Operations Issues)	404-927-7828	Joy.A.Lofton@bridge.bellsouth.com
	Suzie Lavett Director (TAG/LENS)	205-977-2876	Suzie.H.Lavett@bridge.bellsouth.com
	Audrey Thomas Director (EDI)	404-927-7886	Audrey.Thomas@bridge.bellsouth.com
	Al Bolden Director (LNP)	404-927-7011	Al.Bolden2@bridge.bellsouth.com
3rd Level	Doug McDougal General Manager (for Systems Issues)	404-927-7505	Doug.Mcdougal@bridge.bellsouth.com
	Dee Freeman-Butler Senior Director (for Business Rules/Operations Issues)	404-927-3545	Dee.Freeman2@bridge.bellsouth.com

Dispute Resolution Process

In the event that an issue is not resolved through the Escalation Process as described herein, including (1) escalation within each company to the person with ultimate authority for Change Control operations, and (2) the services of a joint investigative team, when appropriate, comprised of representatives from BellSouth and the affected CLECs. Resolution of the dispute shall be accomplished as set forth below:

- Either BellSouth or any CLEC affected by the dispute may request mediation through the State Public Service Commission, if available. If mediation is requested, parties shall participate in good faith. If the mediation results in the resolution of the dispute, that resolution shall apply to all CLECs affected by the dispute.
- Without necessity for prior mediation, either BellSouth or any CLEC affected by the dispute may file a formal complaint with the appropriate state regulatory agency, requesting resolution of the issue.

9.0 CHANGES TO THIS PROCESS

The current, approved version of this process document will be stored under the component name "Ccp.doc" (the date of the latest CCP document will be included in the file name). The BellSouth Change Control Manager BCCM (and alternate) will be the only person authorized to update the document version.

Requests for changes to the Change Control Process may be submitted to the BellSouth Change Control Manager (BCCM) using the Change Request form located in the Appendix A. Cosmetic changes (format, typographical errors, clarifications of meaning, etc.) may be made and published by the BCCM (or alternate) without further review. Other changes will be reviewed at the monthly Change Review status meetings following receipt of the request, if included in the published meeting agenda. The CCP participants present at the meeting (in person or by teleconference) will reach an initial determination regarding the requested change(s) by "consensus". For this purpose consensus will mean that no participant has serious objection to the determination of the group. The following initial determinations may be applied:

- Meeting Consensus (BellSouth and the other meeting participants have no serious objection to the change. The change will be balloted for Industry Consensus with the indication that a meeting consensus was reached.)
- Contested Issue (BellSouth and the other meeting participants are unable to reach consensus and the proposals of the parties are firm. The proposals will be balloted for Industry Consensus and the structure of the ballot will indicate that a choice between alternatives must be made.)
- Not Ready for Balloting (BellSouth and the other meeting participants are unable to reach consensus and the proposals of the parties are not firm. The request will not be balloted and will remain open for review during subsequent monthly meetings. The CCP participants will continue to use the associated current change control process. Working documentation reflecting both the current and proposed language may be created to facilitate further discussion.)
- Implement as Cosmetic (BellSouth and the other meeting participants determine that the requested change is a clarification of meaning with no potential negative impact. The change will be implemented and the Change Request will be updated to implemented status and update distributed as per the normal process.)

Subsequent to this initial review the BCCM and a CLEC representative appointed by the CLECs participating in the review shall prepare an official E-mail ballot for distribution to determine the

Industry Consensus. The official Industry Consensus ballot will detail the change(s) being requested, and the significant arguments presented for and against the change during the review. As noted above, the ballot will indicate whether issues are being voted upon as the result of a Meeting Consensus or as a Contested Issue. Each issue presented on the ballot will contain a statement of the change to be approved and in the case of a Contested Issue, a summary of arguments for and arguments against the alternatives. The ballot will be distributed one week following the Status Meeting. CLEC's will have one week in which to cast their vote. Only ballots transmitted before midnight of the due date will be counted. Each CLEC is allowed one vote on each issue presented on the ballot. The CCCM, or other designated individual will cast each CLEC's vote.

The ballot (a sample ballot may be found in the Appendix) will allow CLECs to indicate their agreement or disagreement with the proposed change across a five-step continuum as shown here:

A	B	C	D	E
Agree	Generally Agree	Neutral	Somewhat Disagree	Disagree

When a Contested Issue is presented on the ballot, there will be a continuum for each of the alternatives and the voter must disagree with one (and only one) of the two.

Industry Consensus will exist and the change will be implemented whenever two-thirds of votes cast by the due date are cast in categories A through D. BellSouth may not be able to support all requested changes to the process as proposed. BellSouth will provide a supporting reason(s) to substantiate its position. A CLEC may seek relief through the escalation process if dissatisfied with BellSouth's response. No consensus will exist if over 1/3 of votes for a change are cast in category E –“disagree”.

10.0 TESTING ENVIRONMENT

BellSouth offers Interface and Functional testing to CLECs for the Telecommunications Access Gateway (TAG) and Electronic Data Interchange (EDI) interfaces. The testing opportunities offered are as follows:

- **CLEC Interface Testing** – Testing for CLECs implementing a new interface, product or release.
- **Functional Testing** – Testing conducted in the CLEC Application Verification Environment (CAVE), where CLECs can opt to do further functional testing, or testing to implement a new release.

Test Phases

The following defines the different phases of testing supported by BellSouth:

- **Physical Connectivity Testing** – This required phase of testing verifies communication is properly established and that both parties can send and receive electronic messages. Applicable to LAN users only.
- **Application Connectivity Testing** – This required phase of testing verifies communication is properly established between BellSouth platforms and CLEC specified connectivity methods such as:
 - EDI – VAN or CONNECT:Direct®
 - TAG
- **API Testing** – This optional phase of testing allows the CLEC to verify their software before Application Testing. No test cases are provided and testing is done against the simulator. This phase of testing applies only to CLECs using TAG.
- **Application Testing** – This conditional phase of testing uses a simulator and verifies that the mapping of data is correct and the CLEC software can communicate with BellSouth. This phase is required for TAG users when implementing a new interface, new TCIF issue or new product. This phase of testing verifies Pre-ordering and Ordering data mapping.

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- **Syntax Testing** – This phase of testing verifies compliance to pre-determined structures such as ANSI ASC X12 EDI standards and TCIF industry standards. This phase of testing is required when implementing a new EDI interface or moving to a new EDI map.
 - **Validity Testing** – This phase of testing verifies that the CLEC software can execute firm order test cases in compliance with the BellSouth Business Rules. This phase of testing is required when implementing a new interface, new product, or new TCIF issue.
 - **Production Verification Testing** – This required phase of testing allows BellSouth and CLECs to confirm that transactions flow to the production environment. CLECs are required to submit a production transaction with live data. BellSouth will monitor to ensure that back-end applications can be accessed.
 - **Service Readiness Testing** – This phase of testing only applies if it is included in the CLEC's Interconnection Agreement. This optional phase of testing allows a CLEC to test firm orders end-to-end. This is in BellSouth production environment.
 - **Functional Testing** – This optional phase of testing, conducted in CAVE, allows a CLEC to perform functional testing for ordering on pre-production and post-production releases during the specified period. CLECs may choose to do additional functional testing in CAVE after other phases of testing are complete, or they may use CAVE for new release Functional testing in preparation for migrating to a new release.

All arrangements for testing should be coordinated with the BellSouth Account Team's Sales Support.

Change Control will communicate the CAVE testing window for each new release.

For additional details on the testing environment, regulations and guidelines, please refer to the following BellSouth public Internet site:

www.interconnection.bellsouth.com/carriertypes/lec/html/oss_info.html

11.0 TERMS AND DEFINITIONS

A

Account Team. The Account Teams represent the CLECs and all CLEC interests within BellSouth, that is, the Account Team is the CLECs' advocate within BellSouth. Some of the Account Team functions are listed below:

- | | |
|---|------------------------------|
| - Contract Negotiations | - BonaFide Requests (BFR) |
| - Enhanced Billing Options Negotiations | - Production Support |
| - Customer Education | - Collocation |
| - Technical Assistance | - Testing Support |
| - General Problem Resolution | - Project/Order Coordination |
| - Tariff Interpretation | - Rate Quotations |

Accountability. Individual(s) having responsibility for completing and producing the outputs of each sub-process as defined in the Detailed Process Flow.

Acknowledgement Notification. Notification returned to originator by BCCM indicating receipt of Change Request.

Approved Release Package. Calendar of Candidate Change Requests with consensus target implementation dates as determined at the Release Package Meeting.

B

BellSouth Change Control Manager (BCCM). BellSouth Point of Contact for processing all Change Requests.

BFR (Bonafide Request). Process used for providing custom products and/or services. Bonafide Requests are outside the scope of the Change Control Process and should be referred to the appropriate BellSouth Account Team.

Business Day. A business day is considered any Monday-Friday workday that does not fall on an official BellSouth holiday.

Business Rules. The logical business requirements associated with the Interfaces referenced in this document. Business rules determine the when and the how to populate data for an Interface. Examples of data defined by Business Rules are:

- The five primary transactions sets: 850, 855, 860, 865, and 997
- Data Element Abbreviation and Definition
- Activity Types at the appropriate level (account, line, feature) and the associated Usage Type (optional, conditional, required, not applicable, prohibited)
- Conditions/rules associated with each Activity and Usage Type
 - ◊ Dependencies relative to other data elements
 - ◊ Conditions which will be edited within BellSouth's OSSs
- Valid Value Set
- Data Characteristics

C

Cancellation Notification. Notification returned to originator by the BCCM indicating a Change Request has been canceled for one of the following reasons: Originator cancellation, duplicate request, training issue, or failure to respond to clarification.

Candidate Request List. List of prioritized Change Requests with associated "Need by Dates" as determined at a Change Review Meeting. These requests will be submitted for sizing and sequencing.

Candidate Change Request. Change Requests that have been prioritized at an Change Review Meeting and are eligible for independent sizing and sequencing by BellSouth and each CLEC.

Change Request. A formal request submitted on a Change Request Form, to add new functions, defects or expedited features or Enhancements to existing Interfaces (as identified in the scope) in a production environment.

- Type 1 – BellSouth System Outage. A System Outage is where the system is totally unusable or there is degradation in an existing feature or functionality within the interface.
- Type 2 – Regulatory Change. Any non-Type 1 changes to the interfaces between the CLEC's and BellSouth's operational support systems mandated by regulatory or legal entities, such as the Federal Communications Commission (FCC), a state commission/authority or state and federal courts.

-
- **Type 2-5 – Expedited Feature Change.** The inability for a CLEC to process certain types of LSR's based on the existing functionality to BellSouth's Operational Support Systems (OSS's) that are in the scope of CCP. The change request for an expedite must provide details of the business impact and will fall into one of two categories: 1) A submitted defect that has been re-classified as a feature where the CLEC/BellSouth has determined should be expedited due to impact and 2) an ordering enhancement to an existing interface where the CLEC/BellSouth has determined should be expedited due to impact.
 - **Type 3 – Industry Standard Change.** Any non-Type 1 changes to the interfaces between the CLEC's and BellSouth's operational support systems required to bring these interfaces in line with newly agreed upon telecommunications industry guidelines.
 - **Type 4 – BellSouth Initiated Change.** Any non-Type 1 changes affecting the interfaces between the CLEC's and BellSouth's operational support systems which BellSouth desires to implement on its own accord.
 - **Type 5 – CLEC Initiated Change.** Any non-Type 1 changes affecting the interfaces between the CLEC's and BellSouth's operational support systems, which the CLEC requests BellSouth to implement.
 - **Type 6 – CLEC Impacting Defect.** Any non-type 1 change that corrects problems discovered in production versions of an application interface. These problems are where the interface is not working in accordance to the BellSouth baseline user requirements or the business rules that BellSouth has published or otherwise provided to the CLECs. In addition, if functional requirements agreed upon by BellSouth and the CLECs, results in inoperable functionality, even though software user requirements and business rules match; this will be addressed as a defect. These problems typically affect the CLEC's ability to exchange transactions with BellSouth and may include documentation that is in error, has missing information or is unclear in nature. Type 6 validated defects may not be managed using the Expedited Feature Process as discussed in Section 4, Part 3.

Change Request Status. The status of a Change Request as it flows through the Change Control process as described in the Detailed Process Flow.

- **A = Appeal.** Indicates a cancelled Change Request is being appealed by the originator (Step 3).
- **C = Request Cancelled.** Indicates a Change Request has been canceled due to one of the following reasons (Step 3):
 - **CC = Clarification.** Requested clarification not received in allotted time (7 days).
 - **CD = Duplicate Request.** A request for this change already exists.
 - **CT = Training.** Requested change already exists, additional training may be required.

- **D = Request Purge.** Indicates the cancellation of a Change Request that has been pending for 12 months and has failed to reach the Candidate Request List (Step 3).
- **I = Change Implemented.** Indicates a Change Request has been implemented in a release (Step 10).
- **N = New Change Request.** Indicates a Change Request has been received by the BCCM, but has not been validated (Step 2).
- **P = Pending.** Indicates a Change Request has been accepted by the BCCM and scheduled for Change Review (Step 3 moving to Step 4).
- **PC = Pending Clarification.** Indicates a Clarification Notification has been sent to the originator, BCCM awaiting response (Step 2 or 3).
- **PN = Pending N times.** Indicates a Change Request reached the Candidate Request List, was sized but not scheduled for a release and has cycled through the process N number of times. Example: P1 = 2nd time through process, P2 = 3rd time through process, etc (Step 8).
- **RC = Candidate Request.** Indicates a Change Request has completed the Change Review process and been assigned to the Candidate Request List for sizing and sequencing (Step 5).
- **S – Request Scheduled.** Indicates a Change Request has been scheduled for a release (Step 8).

Change Review Meeting. Meeting held by the Change Review participants to review and prioritize pending Change Requests, generate Candidate Change Requests, and submit Candidate Change Requests for sizing and sequencing.

Change Review Package. Package distributed by the BCCM 5 – 7 business days prior to the Change Review Meeting. The package includes the Meeting Notice, Agenda, Release Management Status Report, Change Request Log, etc.

Clarification Notification. Notification returned to the originator by the BCCM indicating required information has been omitted from the Change Request and must be provided prior to acceptance of the Change Request. The Change Request will be cancelled if clarification is not received by the date indicated on the Clarification Notification.

CLEC Affecting Change. Any change that requires the CLEC to modify the way they operate or to rewrite system code.

CLEC Change Control Manager (CCCM). CLEC Point of Contact for processing Change Requests.

CSM. Customer Support Manager which supports resale and facility based CLECs.

Cycle Time. The time allotted to complete each step in the Change Control Process prior to moving to the next step in the process.

D

Defect. Any non-type 1 change that corrects problems discovered in production versions of an application interface. These problems are where the interface is not working in accordance to the BellSouth baseline user requirements or the business rules that BellSouth has published or otherwise provided to the CLECs. In addition, if functional requirements agreed upon by BellSouth and the CLECs, results in inoperable functionality, even though software user requirements and business rules match; this will be addressed as a defect.

These problems typically affect the CLEC's ability to exchange transactions with BellSouth and may include documentation that is in error, has missing information or is unclear in nature.

Type 6 validated defects may not be managed using the Expedited Feature Process as discussed in Section 4, Part 3.

Defect Status. The status of a CLEC Impacting Defect Change Request as it flows through the Change Control process as described in the Detailed Process Flow.

- **A = Appeal.** Indicates a cancelled Change Request is being appealed by the originator (Step 3).
- **C = Cancelled.** Indicates a Change Request has been canceled due to one of the following reasons (Step 3):
 - **CC = Clarification.** Requested clarification not received in allotted time (2 days).
 - **CD = Duplicate Request.** A request for this change already exists.
 - **CT = Training.** Requested change already exists, or CLEC training issue.
- **I = Implemented.** Indicates a Defect Change Request has been implemented in a release (Step 6).
- **N = New Defect Change Request.** Indicates a Defect Change Request has been received by the BCCM and the change request form validated for completeness (Step 2).

-
- **PC = Pending Clarification.** Indicates a Clarification Notification has been sent to the originator, BCCM awaiting response (Step 2 or 3).
 - **S = Scheduled for Release.** Indicates a Defect Change Request has been scheduled for a release (Step 6).
 - **V = Validated Defect.** Indicates internal analysis has been conducted and it is determined that it is a validated defect/expedite (Step 3).
 - **W = Workaround Identified.** Indicates a workaround has been developed and communicated to impacted CLEC community (Step 4).

E

Electronic Communications Systems (ECS). ECS is the help desk for reporting system outages or degradation in an existing feature/functionality within an interface. The ECS group works with the CLEC community to resolve system outages/degradation in a timely manner. The telephone number for the ECS group is 1-888-462-8030.

Enhancement. Functions which have never been introduced into the system; improving or expanding existing functions; required functional changes to system interfaces (user and other systems), data, or business rules (processing algorithms – how a process must be performed); any change in the User Requirements in a production system.

Expedited Feature. An expedited feature is the inability for a CLEC to process certain types of LSR's based on the existing functionality to BellSouth's operations support systems (OSS's) that are in the scope of Change Control. The change request for an expedite must provide details of the business impact and will fall into one of two categories: 1) a submitted defect that has been re-classified as a feature where the CLEC/BellSouth has determined should be expedited due to impact and 2) an enhancement to an existing product or service where the CLEC/BellSouth has determined should be expedited due to impact. For both re-classified defects and enhancements to an existing interface, the rules surrounding the expedited feature request will be:

- Must be an enhancement to an existing interface
- Will follow the Expedited Feature process flow which is based on the current Types 2-5 process flow using agreed upon intervals with the exception of Steps 4-6 that are eliminated.
- The CLEC/BellSouth will be required to give impacts and the consequences for not implementing the feature in the current, next, or point release, best effort.

H

High Impact. The failure causes impairment of critical system functions and no electronic workaround solution exists.

I

Internal Change Management Process. Internal process unique to BellSouth and each participating CLEC for managing and controlling Change Requests.

L

Low Impact. The failure causes inconvenience or annoyance.

M

Medium Impact. The failure causes impairment of critical system functions, though a workaround solution does exist.

N

Need-by-Date. Date used to determine implementation of a Change Request. This date is derived at the Change Review Meeting through team consensus. Example: 1Q99 or Release XX.

P

Points of Contact (POC). An individual that functions as the unique entry point for change requests on this process.

Priority. The level of urgency assigned for resource allocation to implement a change. Priority may be initially entered by the originator of the Change Request, but may be changed by the BCCM with concurrence from the originator or the Review Meeting participants. In addition,

level of priority is not an indication of the timeframe in which the Change Request will be worked. It is the originator's label to determine the priority of the request submitted.

One of four priorities may be assigned:

1-Urgent. Should be implemented as soon as possible. Resources may be pulled from scheduled release efforts to expedite this item. A need-by date will be established during the Change Review Meeting. A special release may be required if the next scheduled release does not meet the agreed upon need-by date.

2-High. Implement in the next possible scheduled major release, as determined during the Release Package Meeting.

3-Medium. Implement in a future scheduled major release. A scheduled release will be established during the Release Package Meeting.

4-Low. Implement in a future scheduled major release only after all other priorities. A scheduled release will be established during the Release Package Meeting.

Project Plan. Document which defines the strategy for Release Management and Implementation, including Scope Statement, Communication Plan, Work Breakdown Structure, etc. See Release Management Project Plan template, Attachment B-1.

Proposed Release Package: Proposed set of change requests slated for a release that the BCCM presents to the CLEC community during the Release Package Meeting

R

Release – Industry. The implementation of new industry standard(s) which may impact and require CLECs to make changes to their interface. An industry release may prohibit the use of an interface upon implementation of the Change(s).

Release – Maintenance. The implementation of scheduled maintenance of a BellSouth system that does not require CLECs to make changes to their interface or prohibit the use of an interface upon implementation. System downtime may be required.

Release – Major. The implementation of scheduled Change(s) which may impact and require the entire CLEC community to make changes to their interface. A major release may prohibit the use of an interface upon implementation of the Change(s).

Release – Minor. The implementation of scheduled Change(s) that may not require CLECs to make changes to their interface or do not prohibit the use of an interface upon implementation.

Release Package. Package distributed by the BCCM listing the Candidate Change Requests that have been targeted for a scheduled release.

Release Package Notification. Package distributed by the BCCM and used to conduct an initial Release Management and Implementation meeting. The package includes the list of participants, meeting date, time, Approved Release Package, Defect and/or Expedite Notification, etc.

Release Schedule: Schedule that contains the intended dates for implementation of software enhancements. This release schedule is created annually.

S

Specifications. Detailed, exact document(s) describing enhancement and/or defects, business processes and documentation changes requested and included with the Change Request as additional information.

System Outage. A System Outage is where the system is totally unusable or there is degradation in an existing feature or functionality within the interface.

V

Version (Document). Indicates variation of an earlier Change Control process document. Users can identify the latest version by the version control number.

APPENDIX A – CHANGE CONTROL FORMS

See Attached Forms

This section identifies the forms to be used during the initial phases of the Change Control process accompanied by a brief explanation of their use. Attachments A1 – A-4A contains sample Change Control forms and line by line Checklists.

Change Request Form. Used when submitting a request for a change (Attachment A-1).

Change Request Form Checklist. Provides line-by-line instructions for completing the Change Request form (Attachment A-1A).

Change Request Clarification Response. Used when responding to request for clarification or Clarification Notification (Attachment A-2).

Change Request Clarification Checklist. Provides line-by-line instructions for completing the Change Request Clarification Response (Attachment A-2A).

Acknowledgement Notification. Advises originator of receipt of Change Request by BCCM (Attachment A-3).

Acknowledgement Notification Checklist. Provides line-by-lines instructions for completing the Acknowledgement Notification. (Attachment A-3A).

Cancellation Notification. Advises the originator of cancellation of a Change Request (Attachment A-3).

Cancellation Notification Checklist. Provides line-by-line instructions for completing the Cancellation Notification. (Attachment A-3B).

Clarification Notification. Advises originator that a Change Request is being held pending receipt of additional information (Attachment A-4).

Clarification Notification Checklist. Provides line-by-line instructions for completing the Clarification Notification. (Attachment A-4A).

Letter of Intent. CLEC provides notice of intent to implement a TCIF compliant interface within a specified timeframe. (Attachment A-5).

APPENDIX B – RELEASE MANAGEMENT

See Attached Forms

Release Management and Project Implementation are described in Step 10 of the Change Control Process. Project Managers are responsible for confirming the release date, developing project plans and requirements, providing the WBS, Gantt chart and Executive Summary to the BCCM for input to the Change Review Package and ensuring the successful implementation of the release.

The BST Change Control Manager (BCCM) will distribute the Release Notification Information via web. The Notification should contain the following information:

- List of participants (Project Managers from each stakeholder)
- Date(s) for the next Project Manage Release meeting(s)
- Times
- Logistics
- Meeting facilitator and minutes originator (rotated between stakeholders)
- Current Approved Release Package (email attachment)
- Current Maintenance/Defect Notification Information (web posting)
- Draft Release Project Plan - WBS (email attachment created by the Lead Project Manager (s) assigned in step 8 of the Change Control Process)
- Lead Project Manager (s) assigned to the Release with reach numbers (s)

Attachments B1 – B12 contain templates designed to assist the Project Manager(s) in conducting project management responsibilities as needed for Release Management and Implementation.

APPENDIX C –ADDITIONAL DOCUMENTS

See Attached Documents

APPENDIX D –BST VERSIONING POLICY FOR INDUSTRY STANDARD ORDERING INTERFACES

Since August 1998, BellSouth's policy, which is stated in its Statement of Generally Accepted Terms (SGAT) and standard interconnection agreement, has been to support two industry standard versions of the applicable electronic interfaces at all times. Currently, the EDI and TAG electronic interfaces are maintained this way, because they are the interfaces that require the CLEC to "build" its side of the interface to use the new standard. The two industry standard versions of an interface are maintained when BellSouth is implementing an entirely new version of an interface based on new industry standards, not when BellSouth is simply enhancing an existing interface. Periodically, the standards organizations for an interface will issue a new set of standards. After submitting the new standards to the CCP to determine how and when they will be implemented, BellSouth will introduce a new version of that interface based on the new standards. BellSouth will keep the "old" version of the interface based on the old industry standards "up" for those CLECs that have not had enough time to build their side of the interface to the new industry standards. BellSouth gives CLECs six (6) months advance notice of the implementation of electronic interfaces based on new industry standards.

When a new industry standard for the interface is issued, the most recent prior industry standard version of the interface will be frozen - no changes will be made to the old version of the interface. BellSouth will support both the new industry standard version and the old industry standard version until the next set of industry standards is issued. Then, BellSouth will support the two most recent industry standard versions of the interface. If, for example, version A were based on the current industry standards, then following the implementation of version B based on the new industry standards, BellSouth would freeze version A until the implementation of version C. Upon the implementation of the version C of the interface based on the newest industry standards, BellSouth would no longer support version A, would freeze version B, and would support both version C and the frozen version B until the implementation of next set of the industry standards.

For example, in March 1998, BellSouth released a new industry standard version of EDI based on TCIF version 7.0. Between March 1998 and January 2000, BellSouth implemented a series of major releases (4.0 and 5.0) and a series of "point releases" (4.1, 4.2, etc. and 5.1, 5.2, etc.). The final "point release" of EDI was Release 5.8. In January 2000, BellSouth implemented Release 6.0 of EDI based on TCIF 9.0. When this occurred, BellSouth began maintaining Release 5.8 alongside of Release 6.0 of EDI.

NOTE: Because LENS is not an industry standard, machine-to-machine interface, LENS is not covered under the policy described above.

APPENDIX E –SUB-TEAM DEFINITION AND ROLES/RESPONSIBILITIES

A Sub-Team will be formed for issues that are more effectively addressed in a small group setting.

The Sub-Team will consist of CLECs and BellSouth who volunteer to participate in meeting(s) to address a specific issue. This team will be responsible for presenting information and making recommendations to the CLEC participants of Change Control.

The Change Control Management Team will be responsible for coordinating meetings and the flow of communications.

APPENDIX F –“SAMPLE”VOTING BALLOT

ITEM NO. XX - Meeting Consensus	<input type="checkbox"/> Agree
Description of Section	<input type="checkbox"/> Generally Agree
	<input type="checkbox"/> Neutral
	<input type="checkbox"/> Somewhat Disagree
	<input type="checkbox"/> Disagree
ITEM NO. XX - Contested Consensus (Voters must disagree with one (1) of the following recommendations and indicate ranking of the other)	<input type="checkbox"/> Agree
Description of Section	<input type="checkbox"/> Generally Agree
CLEC Recommendation	<input type="checkbox"/> Neutral
	<input type="checkbox"/> Somewhat Disagree
	<input type="checkbox"/> Disagree
BellSouth Recommendation	<input type="checkbox"/> Agree
	<input type="checkbox"/> Generally Agree
	<input type="checkbox"/> Neutral
	<input type="checkbox"/> Somewhat Disagree
	<input type="checkbox"/> Disagree

APPENDIX G – Carrier Notifications

Carrier Notifications for updates to the Local Exchange Ordering Guide – Volume 1 and the BellSouth Business Rules for Local Ordering (BBR-LO) indicate if the change impacts documentation only or the electronic and/or manual ordering processes, if known. Details of the change are contained in the Summary of Changes that is distributed to the CLECs via email.

Change Request number(s) will be listed in the associated Carrier Notifications for software releases, if applicable. Associated documentation changes for software releases are also reflected in the Carrier Notification Letter.

A table consisting of the scheduled release dates and an itemization of release features is attached to each revised Carrier Notification letter. Each revised letter provides direct access to the original letter.

NOTE: BellSouth Carrier Notifications are located on the BellSouth Interconnection Website at: www.interconnection.bellsouth.com/main/clec.html

Transmittal Cover Sheet for Pate Rebuttal Exhibit RMP-2

This sheet transmits the
BellSouth Change Control Process Guide, Version 2.5
(Marked-Up CCP "Working Version")

which consists of 88 pages.



CHANGE CONTROL PROCESS

CCPWORK_DOC.DOC

JULY 18, 2001

VERSION 2.5

(WORKING DOCUMENT)

Issued: 7/18/01

Jointly Developed by the Change Control Sub-team comprised
of BellSouth and CLEC Representatives.

BellSouth Telecommunications reserves the right to revise this document for any reason, with concurrence of the CLEC/BellSouth Review Board, including but not limited to, conformity with standards promulgated by various government or regulatory agencies, utilization of advance in the state of the technical arts, or the reflection of changes in the design of any equipment, techniques, or procedures described or referred to herein. LIABILITY TO ANYONE ARISING OUT OF USE OR RELIANCE UPON ANY INFORMATION SET FORTH HEREIN IS EXPRESSLY DISCLAIMED, AND NO REPRESENTATIONS OR WARRANTIES, EXPRESSED OR IMPLIED, ARE MADE WITH RESPECT TO THE ACCURACY OR UTILITY OF ANY INFORMATION SET FORTH HEREIN.

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Issued: 7/18/01

Jointly Developed by the Change Control Sub-team comprised
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VERSION CHANGE HISTORY

This section list changes made to the baseline Electronic Interface Change Control Process document since the last issue. New versions of this document may be obtained via BellSouth's Web site.

Version	Issue Date	Section Revised	Reason for Revision
1.0	04/14/98		Initial issue.
1.2	2/28/00	All	<p>The EICCP Documentation has been modified to incorporate:</p> <ul style="list-style-type: none">- Multiple Change Request Types (CLEC Initiated, BST Initiated, Industry Standards, Regulatory and System Outages)- Incorporated manual process- Defined cycle times for process intervals and notifications- Defect Notification process- Escalation Process- Modified Change Control forms to support process changes- Changed EICCP to CCP
1.3	3/14/00	All	<p>The CCP Documentation has been modified to incorporate:</p> <ul style="list-style-type: none">- Type 6 Change Request, CLEC Impacting Defect- Increased number of participants at Change Review meetings- Changed cycle time for Types 2-5 Step 3 from 20 days to 15 days- Defined Step 4 of the Defect Notification process to include communicating the workaround to the CLEC community- Web Site address for Change Control Process- Notification regarding the Retirement and

			<p>Introduction of new interfaces</p> <ul style="list-style-type: none"> - New status codes for Defect Change Requests - New status codes: 'S' for Scheduled Change Requests and 'I' for Implemented Change Requests (types 2-5 Change Requests) - Removed reference to EDI Helpdesk. Electronic Communications Support (ECS) will be the first point of contact for Type 1 System Outages. - Word changes to provide clarification throughout the document.
1.4	4/12/00	All	<p>The CCP Documentation has been modified to incorporate:</p> <ul style="list-style-type: none"> - Type 1 and 6 Notifications will be communicated to CLECs via e-mail and web posting - Step 3 Cycle Time (Types 2-5) changed from 15 business days to 20 business days - Verbiage to Step 10 (Types 2-5) regarding BellSouth presenting baseline requirements - Introduction and Retirement of New Interfaces Section - Dispute Resolution Process - Testing Environment Section - Word changes to provide clarification throughout the document - Monthly Status Meeting Agenda Template - RF1870 Change Request Form changes
1.5	4/26/00	<p>Section 1</p> <p>Section 8</p> <p>Section 11</p>	<ul style="list-style-type: none"> - Updated CCP web site address - Updated Escalation Contacts for Types 2-6 - Added definitions for Account Team and Electronic Communications Support (ECS)
1.6	7/20/00	<p>Section 1</p> <p>Section 2</p>	<ul style="list-style-type: none"> - Added "testing" under process changes - Clarification provided in "Change Review

			Participants" description.
		Section 4	- Added statement regarding submittal of Change Requests
		Part 2	- Clarification provided for documentation changes for business rules
			- Step 2-Added email notification
			- Step 3-Removed "Cancellation by BellSouth"
			- Step 3-Clarification on reject reasons
		Section 5	- Step 3-Clarification on internal validation activities
			- Step 4-Changed cycle time from 5 to 4 bus days for develop workaround
			- Added defect implementation range
		Section 6	- Changed prioritization from "by interface" to "by category"
			- Changed timeframe for receiving a Change Request prior to a Change Review Meeting from 33 to 30 business days
			- Modified the prioritization voting rules
		Section 7	- Updates to the Introduction and Retirement of Interfaces
		Section 8	- Added Type 6 escalation turnaround time
			- Changed 3 rd Level Escalation contacts for Types 2-6
		Section 11	- Removed "Cancellation by BellSouth" and "Defect Cancelled" definitions
		Appendix A	- Removed "Cancellation by BellSouth" from Change Request Form and Checklist
			- Added Letter of Intent Form
		Appendix C	- Changes to the following forms: Preliminary Priority List, CCP User Registration Form. Added the following forms: Defect Notification Sample, CR Log Legend.
		Appendix D	- Added BellSouth Versioning Policy

		All	Word changes to provide clarification throughout the document.
2.0	08/23/00	<p>Cover</p> <p>Section 3</p> <p>Section 5</p> <p>Section 10</p> <p>Section 11-Terms & Definitions</p> <p>Appendix A</p> <p>All</p>	<ul style="list-style-type: none"> - Removed "Interim" from cover. - Updated Type 6 definition to incorporate new defect and expedited feature definitions. - Replaced Section 5, Defect Notification Process with a "Draft" Defect/Expedite Notification Process. - Reduced the implementation interval for validated defects (High Impact) from 4 - 30 business days to 4 - 25 business days, best effort. - Added Internet Web sites for EDI and TAG Testing Guidelines - Updated definition for Defect. Added definitions for Expedited Feature, High, Medium and Low Impacts. - Modified Change Request Forms (RF1870 and RF1872) to include email address for Change Control. Also added High, Medium and Low Assessment of Impact Levels. - Referenced the handling of expedites and expedite notification where appropriate.
2.1	02/09/01	<p>Section 1 – Introduction</p> <p>Section 3 – Introduction</p> <p>Section 4 – Part 1 Type 1 Detail Process Flow</p>	<ul style="list-style-type: none"> - Added new language to the 8th bulleted item – "including User Guides that support OSS systems currently within the scope of CCP" - Added two new bulleted items dealing with the coordination of test agreements, and questions regarding existing documentation. - Added "language" for Types 2, 3, 4 & 5 – "Type xx changes may be managed using the Expedited Feature Process as discussed in Section 4, Part 3." - Type 6 – CLEC Impacting Defects – Added new defect definition. - Added #4 to the Activities – Step 1

		<p>Section 4 – Part 2 – Types 2-5 Process Flow</p> <p>Section 4 – Part 3 – Expedited Feature Process</p> <p>Section 5 – Part 3 – Defect Process</p>	<ul style="list-style-type: none"> - Added additional sentence to Activity #1 – Step 2 - Added Activity #5 – Step 4 - Added new Expedited Feature Process definition and flow - New Defect title page and definition. - Table 5-1 – Step 1 – Activity - #4 – Attach related requirements and specifications documents. These attachments must include the following, if appropriate. - Table 5-1 – Step 2 – Cycle Time – Replaced old cycle times with: 4 hrs for High Impact, 1 Bus Day for Medium and Low Impact. - Table 5-1 – Step 3 – Cycle Time – Replaced old cycle times with: 2 Bus Day for High Impact, and 3 Bus Days for Medium and Low Impact - Table 5-1 – Step 3 – Outputs – Added new bullet – “Status provided for High Impact Defects to originator via email with 24 hours” - Table 5-1 – Step 4 – Activity – Added language to Activity #3 - ...and to the CLEC community via email and web posting. - Table 5-1 – Step 4 – Cycle Time – Replaced old cycle times with: 2 Bus Days for High Impact and 4 Bus Days for Medium and Low Impact. - Table 5-1 – Step 5 – Activity – Added language to #1 - ...to the CLECs and BellSouth. Added language to Activity #2 - ...defect is implemented. - Table 5-1 – Step 5 – Cycle Time – Replaced old cycle times to reflect: Validated High Impact Defects will be implemented within a
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		<p>Part 1 – Change Review-Prioritization – Release Package Development and Approval</p> <p>Section 7 – Introduction and Retirement of Interfaces</p> <p>Section 8 – Escalation Process</p> <p>Section 8 – Dispute Resolution Process</p> <p>Appendix A</p> <p>Appendix C</p>	<p>4-25 business day range, best effort. Medium Impact will be implemented within 90-business day, best effort. Low Impact will be implemented best effort.</p> <ul style="list-style-type: none"> - Part 1 – Change Review Meeting – 4th paragraph NOTE: Added language to address meetings would occur in March, June, September and December - Part 2 – Change Review Meeting – 4th bullet – Added new bullet - ...BellSouth's estimate of the size and scope of each Change Request. - Part 4 – Developing and Approving Release Packages – 1st bulleted item: New language - Retirement of Interfaces – 1st paragraph sentence: New language - Retirement of Versions – New Language - Retirement of Versions – Appeal Language - New Language for Type 6 High Impact Issues and Medium and Low Impact issues. - Types 2-6 Changes – 1st paragraph – new language. - Types 2-6 Changes – Contact List for High, Medium and Low Impact escalations. - New definition language - Updated CR form & checklist - Updated RF1874 User Registration Form
2.1A	02/15/01	All	<ul style="list-style-type: none"> - Updated various sections of the document to change “language” from defect/expedite to defect and/or expedited features. - Changed reference from Section 9.0 to Section 11.0 – Terms and Definitions where

		Section 8	<p>appropriate.</p> <ul style="list-style-type: none"> - Minor “cosmetic” changes throughout document. - New 2nd Level Escalation Contacts for Types 2-6
2.2	03/26/01	<p>Section 3</p> <p>Section 4</p>	<ul style="list-style-type: none"> - Replaced “business or software requirements” with “user requirements” throughout definition. - Updated the “Type 1 System Outage” language to reflect the posting of outages via email within 15 minutes of verified outage. - Additional language for Step 3 – Reviewing Change Request for Acceptance. - Additional language for Step 3 – OBF issues - Added word “preliminary” in Activity #5 of Step 4 – Prepare for Change Review Meeting - Additional language for Step 4 – Prepare for Change Review Meeting – Sizing information - Added Activities #4 & #5 under Step 5 – Conduct Change Review Meeting. - Updated Activity #3 under Step 5 – Conduct Change Review Meeting – Prioritization Meetings. - Updated Activities #4, #5, #7, & #8 under Step 8 – Conduct Release Package Meeting including Inputs and Outputs. - Updated the 1st bulleted statement in Step 9 – Create Release Package Notification. - Added words “for software changes” in Activity #3 under Step 10 – Release Management and Implementation. - Updated Activity #4 in Step 5 – Release Management and Implementation to clarify “associated with expedited features”...”if applicable”. - Added the words “submitted” to define the

			<p>type of defect; the word “ordering” to define the type of enhancement; and the word “interface” to replace the words “product and services” throughout the definition of Expedited Feature – Part 3.</p>
		Section 5	<ul style="list-style-type: none"> - Part 3 – Expedited Feature Process – Step 4 – Internal Change Management Process: Added the word “minor” to better identify the type of release that formerly was identified as “point”. Also updated language in Cycle Time to reflect “case by case basis not to exceed 25 days.” - Updated flow-chart - Figure 5-1 – Type 6 Process Flow to reflect agreed upon cycle times. - Updated Title Page and Definition – Defect Process – 2nd paragraph – Added word “user” to identify type of requirements. - Added additional bullets (#5 and #6) to Step 3 – Type 6 Detail Process Flow – Internal Validation. - Updated cycle times for High, Medium and Low Impact Defects in Step 3 – Internal Validation. - Updated cycle times for High, Medium and Low Impact Defects in Step 4 – Develop and Validate Workaround.
		Section 6	<ul style="list-style-type: none"> - Updated 1st paragraph in Part 1 – Change Review Meeting to identify categories (pre-order/order, maintenance, manual and documentation, etc.) - Added word “preliminary” to 4th bulleted statement in Part 2 – Change Review Package. - Added new 4th bulleted item under Part 3 – Prioritizing Voting Rules. - Updated 6th bulleted statement under Part 3 – Prioritizing Voting Rules to reverse the forced ranking to read (1 to N, with 1 being the highest) - Added new 7th bulleted item under Part 3 – Prioritizing Voting Rules to add the words “or have little value to the CLEC”.

		Section 7	<ul style="list-style-type: none"> - Updated the language for the “Introduction of New Interfaces”.
		Section 8	<ul style="list-style-type: none"> - Updated 1st paragraph – 1st sentence under “Retirement of Interfaces”. - Added new 7th bulleted item under the “Escalation Process – Guidelines” to specify the time allowed for a status for Type 6 High Impact and Medium and Low Impact issues. - Added new 8th bulleted item under the “Escalation Process – Guidelines” to specify the time allowed for a status for Types 2-5 Expedited Feature Process issues.
		Section 9	<ul style="list-style-type: none"> - Removed the entire section under the “Contact List for Escalation – Types 2-6 Changes” since duplication exists under “Guidelines”.
		Appendix	<ul style="list-style-type: none"> - Updated the entire section under “Changes to the Process” with new language. - Added a new section in the Appendix to define the “Sub-Team Definition and Roles/Responsibilities”. - Added a new section in the Appendix to give a “Sample” Voting Ballot
2.3	05/18/01	Section 4	<ul style="list-style-type: none"> - Updated Step 3, Activity #3, first “bulleted” item to identify a “CLEC” training issue. - Updated Step 5, Activity #7 to remove reference to ‘CRC’ status. - Updated Step 7, Activity #1 to remove “criteria established by the Internal Change Management Process” language.
		Section 5	<ul style="list-style-type: none"> - Added separate section (5.2) to document the flow for Documentation Defects.
2.4	07/02/01	Section 4.0	<ul style="list-style-type: none"> - Part 2 – Types 2-5 Process Flow – Step 6 – Document Change Review Meeting Results – Cycle Time – 5 days - Part 2 – Types 2-5 Process Flow – Step 7 – Internal Change Management Process – Cycle Time – Quarterly

		<ul style="list-style-type: none">- Part 2 – Types 2-5 Process Flow – Step 7 – Internal Change Management Process – Activity 2 “Sizing and Sequencing of prioritized change requests...”- Part 2 – Types 2-5 Process Flow – Step 8 – Conduct Release Package Meeting – Activity 4- Part 2 – Types 2-5 Process Flow – Step 8 – Conduct Release Package Meeting – Cycle Time – Major and Minor Releases- Part 2 – Types 2-5 Process Flow – Step 10 – Release Management and Implementation – Activity 4 – Major Releases – Draft User Requirements- Part 2 – Types 2-5 Process Flow – Step 10 – Release Management and Implementation – Activity 4 – Major Releases – Final User Requirements- Part 2 – Types 2-5 Process Flow – Step 10 – Release Management and Implementation – Activity 4 – Major Releases – Final Specs- Part 2 – Types 2-5 Process Flow – Step 10 – Release Management and Implementation – Activity 4 – Major Releases – Business Rules- Part 2 – Types 2-5 Process Flow – Step 10 – Release Management and Implementation – Activity 4 – Industry Releases – Notification- Part 2 – Types 2-5 Process Flow – Step 10 – Release Management and Implementation – Activity 4 – Industry Releases – Draft User Requirements- Part 2 – Types 2-5 Process Flow – Step 10 – Release Management and Implementation – Activity 4 – Industry Releases – Final User Requirements- Part 2 – Types 2-5 Process Flow – Step 10 – Release Management and Implementation – Activity 4 – Industry Releases – Final EDI Specs- Part 2 – Types 2-5 Process Flow – Step 10 – Release Management and Implementation – Activity 4 – Industry Releases – Business
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			<p>Rules</p> <ul style="list-style-type: none"> - Part 2 – Types 2-5 Process Flow – Step 10 – Release Management and Implementation – Activity 4 – Minor Releases – Draft User Requirements - Part 2 – Types 2-5 Process Flow – Step 10 – Release Management and Implementation – Activity 4 – Minor Releases – Final User Requirements - Part 2 – Types 2-5 Process Flow – Step 10 – Release Management and Implementation – Activity 4 – Minor Releases – Final Specs - Part 2 – Types 2-5 Process Flow – Step 10 – Release Management and Implementation – Activity 4 – Minor Releases – Business Rules - Part 2 – Types 2-5 Process Flow – Step 10 – Release Management and Implementation – Adding sub-process activity #5 - Part 2 – Types 2-5 Process Flow – Step 10 – Release Management and Implementation – Activity #5 - Part 2 – Types 2-5 Process Flow – Step 10 – Release Management and Implementation – Outputs – Adding four (4) bulleted items
		Section 6.0	<ul style="list-style-type: none"> - Part 3 – Expedited Feature Process – Step 3 – Review Change Request for Acceptance - Part 2 – Change Review Package – Adding bulleted statement “Schedule of releases” - Part 4 – Developing and Approving Release Packages – Defining by release when the evaluation and analyzing Candidate Change Requests will take place.
		Section 10.0	<ul style="list-style-type: none"> - Part 4 – Developing and Approving Release Packages – Defining what will occur during the Release Package meeting.
		Terms and Definitions	<ul style="list-style-type: none"> - Testing Environment – Adding “Language” to define “testing opportunities”.
		Appendix	<ul style="list-style-type: none"> - Updated Release definitions - Added Appendix G – Customer Notifications

2.5	7/18/01	Section 8	- Updated 1 st point of contact for Type 1 System Outage Escalations
		Section 9	- Removed "BellSouth" from voting language (associated with CR0411)

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1.0 INTRODUCTION

This document establishes the process by which BellSouth Telecommunications (BST) and Competitive Local Exchange Carriers (CLECs) will manage requested changes to the BellSouth Local Interfaces, the introduction of new interfaces, and provide for the identification and resolution of issues related to Change Requests. This process will cover Change Requests that affect external users of BellSouth's Electronic Interface Applications, associated manual process improvements, performance or ability to provide service including defect and expedite notification. This process shall be referred to as the Change Control Process.

All parties should recognize that deviations from this process might be warranted where unanticipated circumstances arise such that strict application of these guidelines may not result in their intended purpose. Furthermore, deviations may be required due to specific regulatory and business requirements. Parties shall provide appropriate web notification to the CLEC/BST Change Control Team participants prior to deviating from the processes established within this document. All parties will comply with all legal and regulatory requirements.

The Change Control Process will cover change requests for the following interfaces and associated manual processes that have the potential to impact the interfaces connected to BellSouth:

- Local Exchange Navigation System (LENS)
- Electronic Data Interchange (EDI)
- Telecommunications Access Gateway (TAG)
- Trouble Administration Facilitation Interface (TAFI)
- Electronic Communications Trouble Administration (EC-TA) Local
- CLEC Service Order Tracking System (CSOTS)

The types of changes that will be handled by this process are as follows:

- Software
- Hardware
- Industry Standards
- Product and Services (i.e., new services available via the in-scope interfaces)
- New or Revised Edits
- Process (i.e., electronic interfaces and manual processes relative to order, pre-order, maintenance and testing)
- Regulatory
- Documentation (i.e., business rules for electronic and manual processes relative to order, pre-order, maintenance, including User Guides that support OSS systems currently within the scope of CCP)

- Defects
- Expedited Features

The scope of the Change Control Process does not include the following which are handled through existing BellSouth processes:

- BonaFide Requests (BFR)
- Production Support (i.e. adding new users to existing interfaces, existing users requesting first time use of existing BST functionality)
- Contractual Agreements
- Collocation
- Coordination of test agreements will continue to be supported by the Account Team
- Questions regarding existing documentation should be handled by the Account Team. However, if documentation needs to be changed for clarification purposes, a defect Change Request should be submitted through Change Control Team.

OBJECTIVES OF THE CHANGE CONTROL PROCESS:

- Support the Industry guidelines that impact Electronic Interfaces and manual processes relative to order, pre-order, maintenance, and billing as appropriate
- Ensure continuity of business processes and systems operations
- Establish process for communicating and managing changes
- Allow for mutual impact assessment and resource planning to manage and schedule changes
- Capability to prioritize requested changes

The minimum requirements for participation in the Change Control Process electronically are:

- Word 6.0 or greater
- Excel 5.0 or greater
- Internet E-mail address
- Web access

The web site address for the Change Control Process is as follows:

http://www.interconnection.bellsouth.com/markets/lec/ccp_live/index.html

2.0 CHANGE CONTROL ORGANIZATION

The Change Control organizational structure supports the Change Control Process. Each position within the organization has defined roles and responsibilities as outlined in the Change Control Process Flow - Section 4 of this document. Identified positions, along with associated roles and responsibilities are as follows:

Change Review Participants. Representatives from Competitive Local Exchange Carriers (CLECs) and BellSouth. This team meets to review, prioritize, and make recommendations for Candidate Change Requests. The Candidate Change Requests are used as input to the Internal Change Management Processes (refer to process step 7 for Types 2-5 changes).

CLECs and BellSouth will define points of contact in each of their companies for communicating and coordinating change notification. All change requests are made in writing (e-mail is preferred). Notifications will be provided via e-mail and posted to the BellSouth web site.

Each company may bring the number of participants necessary to represent their position. If the number of participants grows to be unmanageable, CLECs and BellSouth will revisit the issue of representation to apply some restrictions.

BellSouth Change Control Manager (BCCM). The BCCM is responsible for managing the Change Control Process and is the main point of contact for Types 2 – 6 changes. This individual maintains the integrity of the Change Requests, prepares for and facilitates the Change Review Meetings, presents the Pending Change Requests to the BST Internal Change Management Process, and ensures that all Notifications are communicated to the appropriate parties.

CLEC Change Control Manager (CCCM). The CCCM is the CLEC point of contact for Change Requests. This individual is responsible for presenting and prioritizing Change Requests at the Change Review Meetings.

Release Management Project Team. A team of CLEC and BellSouth Project Managers who manage the implementation of scheduled changes and releases.

3.0 CHANGE CONTROL DECISION PROCESS

Change requests will be classified by Type. There are six Types:

Type 1 – System Outage

A Type 1 change is a BellSouth System Outage. A System Outage is where the system is totally unusable or there is degradation in an existing feature or functionality within the interface. If the System Outage is not resolved within 20 minutes, a notification will be provided via e-mail and posted to the web within 15 minutes of the outage verification. Either BellSouth or a CLEC may initiate the change request. Type 1 system outages will be processed on an expedited basis. All Type 1 System Outages will be reported to the Electronic Communications Support (ECS) Help Desk. A Type 1 System Outage is a condition where the CLEC Pre-Orders/Orders/Queries/Maintenance Requests cannot be submitted or will not be accepted by BellSouth.

Type 2 – Regulatory Change.

Any non-Type 1 change to the interfaces between the CLEC's and BellSouth's operational support systems mandated by regulatory or legal entities, such as the Federal Communications Commission (FCC), a state commission/authority, or state and federal courts are Type 2 changes. Regulatory changes are not voluntary but are requisite to comply with newly passed legislation, regulatory requirements, or court rulings. While timely compliance is required, the systems requirements and methodology to achieve compliance are usually discretionary and within the scope of change management. Either BellSouth or a CLEC may initiate the change request. Type 2 changes may be managed using the Expedited Feature Process, as discussed in Section 4, Part 3.

Type 3 – Industry Standard Change.

Any non-Type 1 change to the interfaces between the CLEC's and BellSouth's operational support systems required to bring these interfaces in line with newly agreed upon telecommunications industry guidelines are Type 3 changes. Either BellSouth or a CLEC may initiate the change request. Type 3 changes may be managed using the Expedited Feature Process, as discussed in Section 4, Part 3.

Type 4 – BellSouth Initiated Change.

Any non-Type 1 change affecting the interfaces between the CLEC's and BellSouth's operational support systems which BellSouth desires to implement on its own accord. These changes might involve system enhancements, manual and/or business processes. These type changes might also include issues for Pre-Orders, Orders, Queries, and Maintenance Requests that can be submitted

and accepted, but may require clarification. This classification does not include changes imposed upon these interfaces by third parties such as regulatory bodies (which are Type 2 Changes) or standards organizations (which are Type 3 Changes). Type 4 changes may be managed using the Expedited Feature Process, as discussed in Section 4, Part 3.

Type 5 – CLEC Initiated Change.

Any non-Type 1 change affecting interfaces between the CLEC's and BellSouth's operational support systems which the CLEC requests BellSouth to implement is a Type 5 change. These changes might involve system enhancements, manual and/or business processes. These type changes might also include issues for Pre-Orders, Orders, Queries, and Maintenance Requests that can be submitted and accepted, but may require clarification. This classification does not include changes imposed upon these interfaces by third parties such as regulatory bodies (which are Type 2 Changes) or standards organizations (which are Type 3 Changes). Type 5 changes may be managed using the Expedited Feature Process, as discussed in Section 4, Part 3.

Type 6- CLEC Impacting Defects

A Type 6 defect request is any non-Type 1 change that corrects problems discovered in production versions of an application interface. These problems are where the interface is not working in accordance to the BellSouth baseline user requirements or the business rules that BellSouth has published or otherwise provided to the CLECs. In addition, if functional requirements agreed upon by BellSouth and the CLECs, results in inoperable functionality, even though software user requirements and business rules match; this will be addressed as a defect.

These problems typically affect the CLEC's ability to exchange transactions with BellSouth and may include documentation that is in error, has missing information or is unclear in nature.

Type 6 validated defects may not be managed using the Expedited Feature Process as discussed in Section 4, Part 3.

Defect Change Requests will have three (3) Impact Levels:

- High Impact – The failure causes impairment of critical system functions and no electronic workaround solution exists.
- Medium Impact – The failure causes impairment of critical system functions, though a workaround solution does exist.
- Low Impact – The failure causes inconvenience or annoyance.

The CLEC and/or BellSouth may initiate these types of changes affecting interfaces between the CLECs and BellSouth's operational support systems. These type changes might also include

issues for Pre-Orders, Order, Queries, and Maintenance Requests that can be submitted and accepted, but may require workarounds or clarification.

Figure 3-1 shows the top-level process that will be used to evaluate Change Requests. The BellSouth Account Team(s) will handle BFR requests and production support issues. Enhancements, defects and expedited features will be handled through the Change Control Process.

Figure 3-1. Change Control Decision Process

4.0 CHANGE CONTROL PROCESS FLOW

The following three sub-sections describe the process flows for typical Type 1 through Type 5 changes, including Expedited Features. Each sub-section will describe the cycle times for an activity and document accountability, sub-process activities, inputs and outputs for each step in the process. Section 5 of this document describes the process flow for Type 6 changes. Based on the categorization of the request, the following diagram will help guide a CLEC or BellSouth representative to the appropriate process flow based on Change Control Request Type:

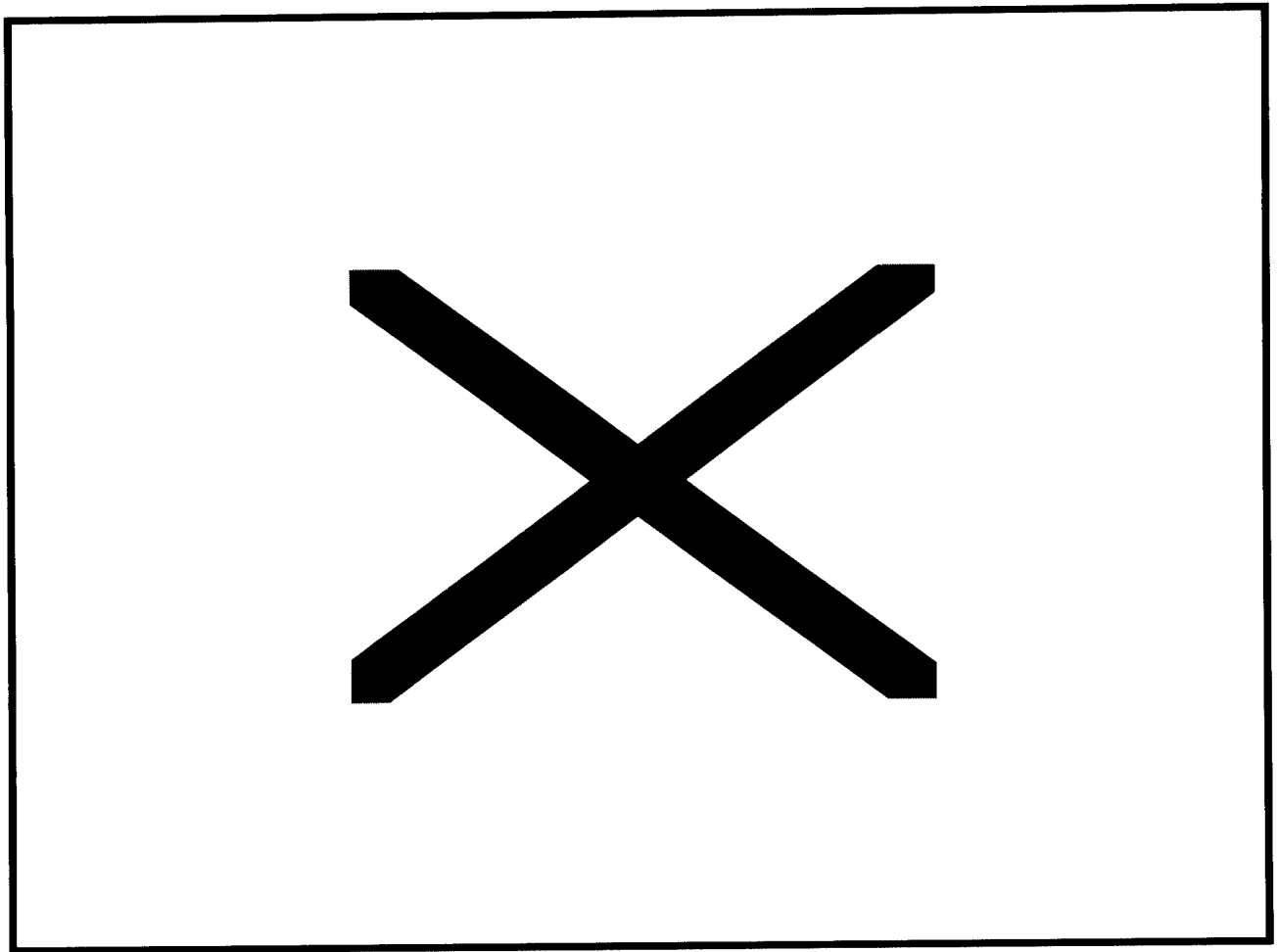


Figure 4-1. Change Control Process Flow

Part 1 - Type 1 Process Flow

Figure 4-2 provides the process flow for resolving a typical Type 1 - System Outage. The Electronic Communications Support (ECS) Group will work with the CLEC community to resolve and communicate information about system outages in a timely manner - actual cycle times are documented in table 4-1 and the sub-process steps. The ECS Helpdesk number is 888-462-8030.

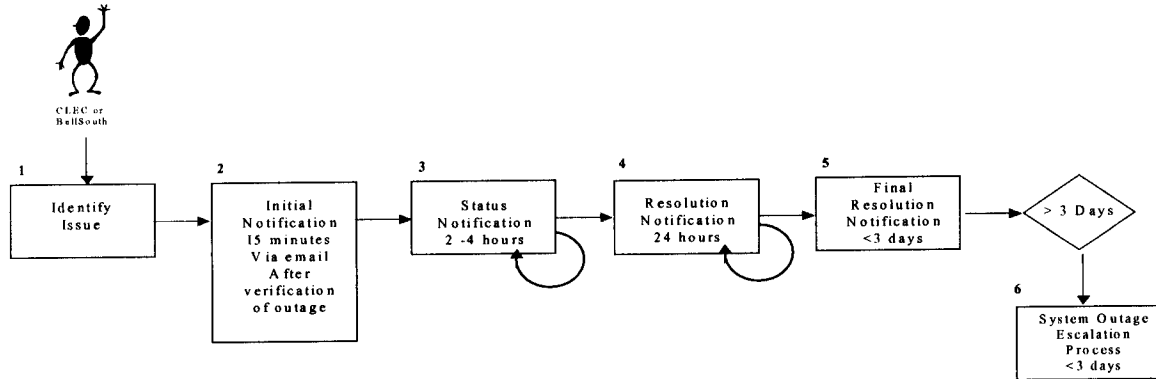


Figure: 4-2. Type 1 Process Flow

Table 4-1 describes the cycle times for each process step that is outlined in the Type 1 - System Outage Process Flow. These cycle times represent typical timeframes for completing the documented step and producing the desired output for the step. In sub-process step 2 "Initial Notification" timeframe for completing this step does not begin until after the outage has been reported. The sub-process steps 3 "Status Notification" and 4 "Resolution Notification" are iterative steps. Iterative steps will be performed one or more times until the exit criteria for that process are met. If resolution is not reached within 20 minutes, BellSouth will provide the initial notification to the CLEC community via e-mail and post outage notification on the web within 15 minutes of the outage verification.

Table 4-1. Type 1 Cycle Times

Process Description	1 Identify Issue	2 Initial Notification	3 Status Notification	4 Resolution Notification	5 Final Resolution Notification	6 Escalation
Cycle Time	N/A	Via email within 15 minutes of the outage verification BST website will be posted with outage information	2 - 4 hours (Iterative)	24 hours (Iterative)	< 3 days	> 3 days System Outage Escalation Process

Note: The Escalation Process may be used at any time within Steps 3-6 if cycle times are not met and/or responses are not acceptable.

The table below details the steps, accountable individuals, tasks, the inputs/outputs and the cycle time of each sub-process in the Type 1 Process Flow. This process will be used to capture and communicate system outage information, status notification(s), resolution and notification(s), and final resolution to the CLEC community. Steps shown in the table are sequential unless otherwise indicated.

Table 4-2. Type 1 Detail Process Flow

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
1	CCCM ECS	<u>IDENTIFY ISSUE:</u> <ol style="list-style-type: none"> Internally determine if outage exists with BellSouth Electronic Interface. (The CLEC should perform internal outage resolution activities to determine if the potential problem involves the BellSouth Electronic Interface). Call the BST Electronic Communications Support (ECS) help desk at 888-462-8030. ECS and individual CLEC will determine if the problem is likely to have no impact on the industry. If there is no impact, the outage will be worked on a bilateral basis. ECS will provide the CLEC with a trouble ticket number, if requested, to record and track the outage. 	<u>INPUTS:</u> <ul style="list-style-type: none"> Issue Characteristics Call to ECS Helpdesk <u>OUTPUTS:</u> <ul style="list-style-type: none"> Recorded Outage 	N/A
2	ECS	<u>INITIAL NOTIFICATION:</u> <ol style="list-style-type: none"> ECS will post to the Web an Initial Industry Notification that a BellSouth Electronic Interface outage has been identified. An e-mail to the CLECs participating in Change Control will also be distributed. The system ticket number of the outage will be included in the web posting and the email notification. The CLEC initiating the Type 1 System Outage will need to be available for communications on an as needed basis. 	<u>INPUTS:</u> <ul style="list-style-type: none"> Recorded Outage <u>OUTPUTS:</u> <ul style="list-style-type: none"> Industry Notification posted on Web E-mail to CLECs participating in Change Control 	BellSouth will provide email notification to the CLECs via Change Control of Type 1 system outages within 15

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		<ol style="list-style-type: none"> ECS will continue to work towards the resolution of the problem If outage is resolved, this notice is the first and final notification. The process for the item has ended. Outage Information will be reported in the monthly status meeting by the BCCM. 		minutes of the outage verification. In addition, BellSouth will continue to post the outage information on the CCP website.
3	ECS	<p><u>STATUS NOTIFICATION: (ITERATIVE)</u></p> <ol style="list-style-type: none"> If the outage is not resolved, ECS will continue to work towards the resolution on the problem. ECS may communicate with the industry / affected parties. The following information may be discussed: <ul style="list-style-type: none"> Clarification of outage Current status of resolution Agreement of resolution If a resolution has not been identified continue giving status notifications to the industry and continue repeating Step 3 "Status Notification" via the web. Proceed to Step 4 "Resolution Notification" when a resolution has been identified. 	<p><u>INPUTS:</u></p> <ul style="list-style-type: none"> Industry Notification posted on Web <p><u>OUTPUTS:</u></p> <ul style="list-style-type: none"> Status Notification posted on Web Resolution information 	2-4 hour intervals
4	ECS CCCM	<p><u>RESOLUTION NOTIFICATION: (ITERATIVE)</u></p> <ol style="list-style-type: none"> The resolution notification is posted to the Web. If the item is determined to be a defect, the CLEC that initiated the call will submit a "Change Request Form" checking the Type 6 box. If the resolution is not the final resolution the process will loop back to Step 3 "Status Notification". 	<p><u>INPUTS:</u></p> <ul style="list-style-type: none"> Status Notification posted on Web Resolution information <p><u>OUTPUTS:</u></p> <ul style="list-style-type: none"> Resolution Information posted on Web Final Resolution Information 	24 hours after reporting outage

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		BellSouth will continue to work towards the final resolution. 4. When the final resolution has been created, proceed to Step 5 "Final Resolution Notification".		
5	ECS	<u>FINAL RESOLUTION NOTIFICATION:</u> 1. The final resolution notification is posted on the Web.	<u>INPUTS:</u> <ul style="list-style-type: none"> Final Resolution Information <u>OUTPUTS:</u> <ul style="list-style-type: none"> Final Resolution Notification 	< 3 days
6	CCCM ECS	<u>ESCALATION</u> 1. Escalation is appropriate anytime the interval exceeds the recommended guidelines for notification. 2. Refer to the Type 1 - Escalation Process documented in Section 8.	<u>INPUTS:</u> <ul style="list-style-type: none"> Information or concern relating to a Type 1 - Systems Outage <u>OUTPUTS:</u> <ul style="list-style-type: none"> Documented Escalation Escalation Response 	➤ 3 days (The Escalation Process may be used at any time within Steps 3-6 if cycle times are not met and/or responses are not acceptable.)

Part 2 – Types 2-5 Process Flow

Figure 4-3 provides the process flow for reviewing, scheduling and implementing a typical Type 2-5 Change Request. The process diagram applies to Change Requests submitted via the Change Control Process. Change Requests should be submitted to the BellSouth Change Control Manager using the standard Change Request form template. This template can be acquired on the Change Control web page. Change Requests may be submitted for interfaces that are currently being utilized, in the testing phase, or if a Letter of Intent is on file with the BCCM.

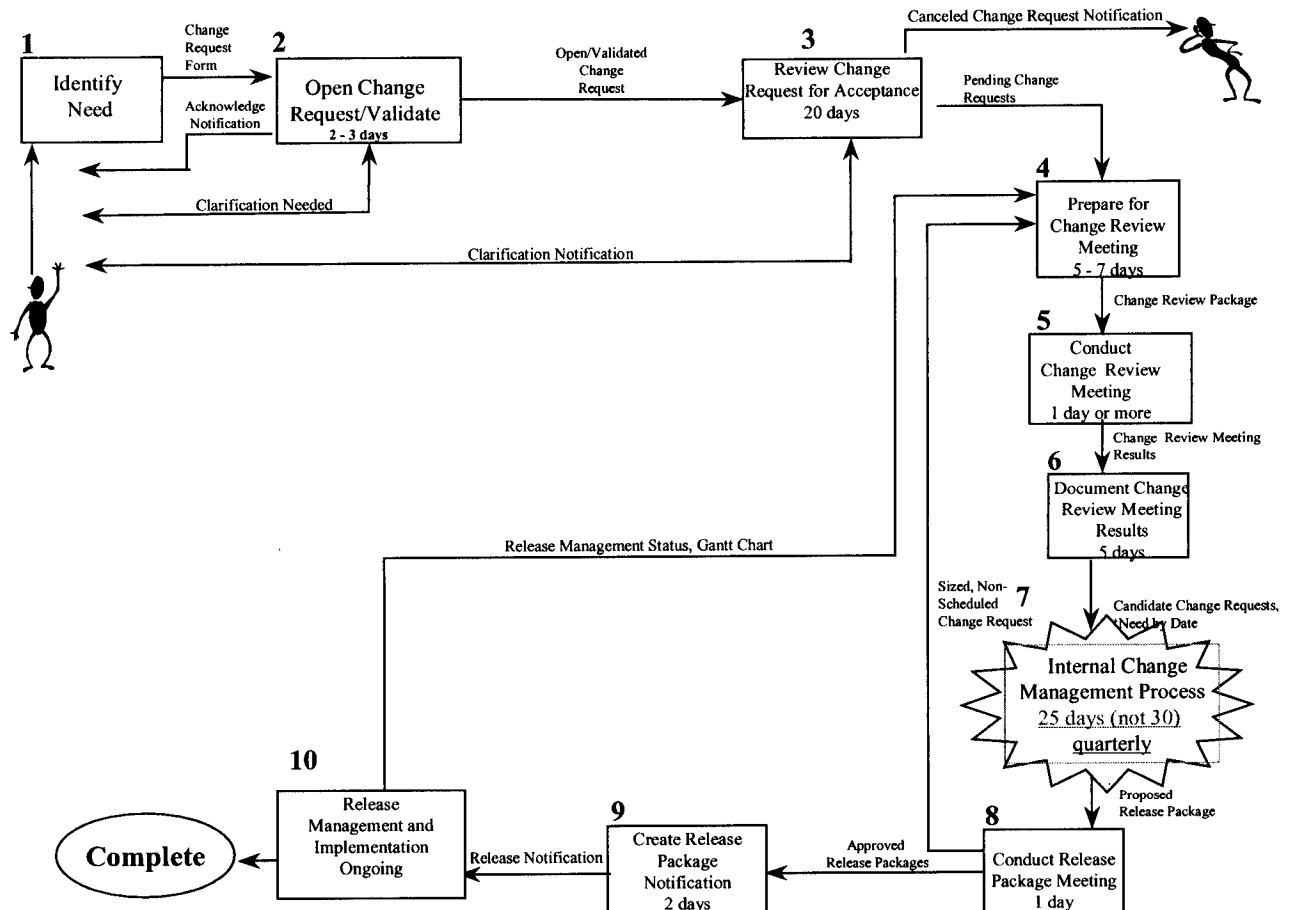


Figure 4-3. Change Control Process Flow

The table below details the steps, accountable individuals, tasks, inputs/outputs and cycle times of each sub-process in the Change Control process. This process will be used to develop Candidate Change Requests that will be used as input to the Internal Change Management Process. Steps shown in the table are sequential unless otherwise indicated.

Table 4-3. Types 2-5 Detail Process Flow

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
1	CCCM BCCM	IDENTIFY NEED <ol style="list-style-type: none"> Internally determine need for change request. These change requests might involve system enhancements, manual and/or business process changes. Originator and CCCM or BCCM should complete the standardized Change Request Form according to Checklist. Attach related requirements and specification documents. (See Attachment A-1A, Item 22) Appropriate CCCM/BCCM submits Change Request Form and related information via e-mail to BellSouth. 	INPUTS: <ul style="list-style-type: none"> Change Request Form (Attachment A-1) Change Request Form Checklist (Attachment A-1A) OUTPUTS: <ul style="list-style-type: none"> Completed Change Request Form with related documentation 	N/A
2	BCCM	OPEN CHANGE REQUEST/VALIDATE CHANGE REQUEST FOR COMPLETENESS <ol style="list-style-type: none"> Log Request in Change Request Log. Send Acknowledgement Notification (Attachment A-3) via e-mail to originator. Establish request status ('N' for New Request) Review change request for mandatory fields using the Change Request Form Checklist. Verify Change Request specifications and related information exists. Send Clarification Notification via email to the originator (Attachment A-4) if needed. Update Change Request Status to "PC" for Pending Clarification if clarification is needed. CLEC or BellSouth Originator	INPUTS: <ul style="list-style-type: none"> Completed Change Request Form with related documentation Change Request Form Checklist Change Request Clarification Response OUTPUTS: <ul style="list-style-type: none"> New Change Request Acknowledgment Notification Validated Change Request Clarification Notification Industry Notification via e-mail and web posting 	2-3 Bus Days Clarification times would be in addition to cycle time.

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		If clarification is needed, make necessary corrections per Clarification Notification and submit Change Request Clarification Response (Attachment A-2).		
3	BCCM	<p><u>REVIEW CHANGE REQUEST FOR ACCEPTANCE</u></p> <ol style="list-style-type: none"> 1. Review Change Request and related information for content. 2. Change Request reviewed for impacted areas (i.e., system, manual process, documentation) and adverse impacts. 3. Determine status of request: <ul style="list-style-type: none"> • If change already exist or is a CLEC training issue forward Cancellation Notification (Attachment A-3) to CCCM or BCCM and update status to 'C' for Request Canceled or 'CT' for Training. If Training issue, refer to CSM or Account Team. • If Change Request Clarification Notification not received, validate with CLEC that change request is no longer needed. • If request is accepted, update Change Request status to "P" for Pending in Change Request Log. <p>NOTE: See Section 11.0 Terms and Definitions – Change Request Status for valid status codes and descriptions.</p> <p>BellSouth may determine that a CLEC initiated change request cannot be accepted because of cost, industry direction or because it is considered not technically feasible to implement. If requested, the appropriate BellSouth SME will participate in the Monthly Status Meeting to address the reason for rejection and discuss alternatives with the CLEC community. The SME must be provided a minimum of two-week advance notice to participate in the upcoming Monthly Status Meeting.</p>	<p><u>INPUTS:</u></p> <ul style="list-style-type: none"> • New Change Request • Validated Change Request • Clarification Notification (if required) <p><u>OUTPUTS:</u></p> <ul style="list-style-type: none"> • Pending Change Request • Clarification Notification (if required) • Cancellation Notification (if required) • CR status updated on web 	20 Bus Days

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		<p><u>OBF Issues</u> All change requests that are being actively discussed at OBF, or are on the agenda to be discussed, will be deferred. If the issue is not active and will not be considered within the next six (6) months, and there is agreement between BellSouth and affected CLECs to proceed prior to an OBF resolution, BellSouth will determine if it can support the request.</p>		
4	BCCM CCCM	<p><u>PREPARE FOR CHANGE REVIEW MEETING</u></p> <p>NOTE: These activities take place to prepare for Change review meetings when prioritizations take place.</p> <p><u>BCCM</u></p> <ol style="list-style-type: none"> 1. Prepare an agenda. 2. Make meeting preparations. 3. Update Change Request Log with current status for new and existing Change Requests. 4. Prepare and post Change Request to web. 5. Provide preliminary size and scope information on each pending change request to CLECs. <p><u>CCCM</u></p> <ol style="list-style-type: none"> 1. Analyze Pending Change Requests. 2. Determine priorities for change requests and establish "Desired/Want" dates. 3. Create draft Priority List to prepare for Change Review meeting. <p>The sizing information provided with the Change Review Meeting package is a preliminary estimate of the work effort. After prioritization, each interface is assessed in depth to determine the scope of the change request. Based on this assessment, an adjustment in the sizing may be required.</p>	<p><u>INPUTS:</u></p> <ul style="list-style-type: none"> • Pending Change Request Notifications • Project Release Status (Step 10) • Change Request Log <p><u>OUTPUTS:</u></p> <ul style="list-style-type: none"> • Change Request Log • CLEC Draft Priority List • Preliminary Size and scope on each Pending change request 	5-7 Bus Days

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		<p>SIZING OF WORK EFFORTS:</p> <p>LARGE</p> <ul style="list-style-type: none"> Multiple Systems Dependencies New Functionality <p>MEDIUM</p> <ul style="list-style-type: none"> Limited Systems Dependencies New/Change Existing Functionality <p>SMALL</p> <ul style="list-style-type: none"> No system dependencies Change Existing Functionality <p>6-14-01 Open issue. AT&T to submit CLEC language.</p>		
5	BCCM CCCM	<p>CONDUCT CHANGE REVIEW MEETING</p> <p>Monthly Status Meetings</p> <ol style="list-style-type: none"> Communicate regulatory mandates. Review status of pending/approved Change Requests (including defects and expedited features) at monthly status meeting. Review current Release Management statuses. Review issues and action items and assign owners. Present new change requests submitted since previous Monthly Status Meeting. <p>Prioritization Meetings (held quarterly in March, June, September and December)</p> <ol style="list-style-type: none"> Follow Steps 1-3 from Monthly Status Meetings. Initiators present Change Requests. BellSouth presents the preliminary size and scope of each change request. BellSouth presents the number of 	<p>INPUTS:</p> <ul style="list-style-type: none"> Change Request Log CLEC Draft Priority List Desired/Want Dates Impact analysis Preliminary Size and scope on each Pending change request <p>OUTPUTS:</p> <ul style="list-style-type: none"> Meeting minutes Updated Change Request Log Candidate Change Request List Issues and Actions Items (if required) 	<p>1 Bus Day (or as needed based on volume)</p> <p>Meeting Day</p>

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		<p>major releases and dates targeted for the next 12 months.</p> <ol style="list-style-type: none"> Discuss Impacts. Prioritize Change Requests. Develop final Candidate Requests list of Pending Change Requests by category, 'Need by Dates' and prioritized Change Requests. Update Change Request Log to 'RC' for Candidate Request List, 'C' for Canceled, 'P' for Pending, as appropriate. Review issues and action items and assign owners. 		
6	BCCM	<p><u>DOCUMENT CHANGE REVIEW MEETING RESULTS</u></p> <ol style="list-style-type: none"> Prepare and distribute outputs from Step 5. 	<p><u>INPUTS:</u></p> <ul style="list-style-type: none"> Change Request Log Final Candidate Request List <p><u>OUTPUTS:</u></p> <ul style="list-style-type: none"> Updated Change Request Log Web posting of meeting output 	5 Bus Days
7	BCCM CCCM	<p><u>INTERNAL CHANGE MANAGEMENT PROCESS</u></p> <ol style="list-style-type: none"> Both BellSouth and CLECs will perform analysis, impact, sizing and estimating activities to the Candidate Change Requests. This ensures that participating parties are reviewing capacity and impacts to schedules before assigning resources to activities. <u>Sizing and sequencing of prioritized change requests will begin with the top priority items and continue down through the list until the capacity constraints have been reached for each future release. (1-10-01) Agree to add 'for the next release' – Delete: each future release</u> <p><u>(2-16-01) Sizing and sequencing of prioritized change requests will begin with</u></p>	<p><u>INPUTS:</u></p> <ul style="list-style-type: none"> Candidate Change Request List with agreed upon 'Need by Dates' Change Request Log <p><u>OUTPUTS:</u></p> <ul style="list-style-type: none"> BellSouth's Proposed Release Package CLEC analysis 	<p>30-25 Bus Days</p> <p>4-20-01 Quarterly (based on release schedule)</p> <p><i>Balloted as a contested item (Ballot #5).</i></p>

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		<p>the top priority items and continue down through the list until the capacity constraints have been reached. (did not pass email ballot)</p> <p>(4-20-01) Sizing and sequencing of prioritized change requests will begin with the top priority items and continue down through the list for the next two releases (rejected by CLECs on 4-25-01).</p> <p>(5-18-01) Sizing and sequencing of prioritized change requests will begin with the top priority items and continue down through the list until the capacity constraints have been reached for the next release.</p> <p><i>Balloted as a contested item. (Ballot #5)</i></p> <p>3. <u>All Candidate Change Requests will be assigned to as many future releases as necessary to complete the assignment process. (1-10-01 BellSouth cannot support)</u></p> <p>(2-16-01) At a minimum, a target release date will be provided for the top five (5) change requests which could include the next and/or future release. (Rejected by CLEC community at 2-21-01 mtg)</p> <p>(4-20-01) All candidate requests will be considered for the next two releases (rejected by CLECs on 4-25-01).</p> <p>(5-18-01) All candidate requests will be considered for the upcoming release (open item).</p>		
8	BCCM CCCM	<p><u>CONDUCT RELEASE PACKAGE MEETING</u></p> <ol style="list-style-type: none"> 1. Prepare agenda. 2. Make meeting preparations. 3. Evaluate proposed release schedule. 4. One CCP master prioritization list will be maintained. One month 	<p><u>INPUTS:</u></p> <ul style="list-style-type: none"> • BellSouth's Proposed Release Package • BellSouth's Release Schedule • Change Request Log 	1 Bus Day

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		<p>prior to each Change Review Meeting, CLEC/BST will determine the process for prioritizing change requests. Options include:</p> <ul style="list-style-type: none"> - Prioritize all change requests (new pending and non-scheduled) - Prioritize only the new pending requests. An average ranking will be calculated and incorporated into the CCP master prioritization list. <p>5. Based on BST/CLEC consensus, create the Approved Release Package. CLECs, based on group consensus, may request changes to the proposed scope (like for like-size CRs). BellSouth will evaluate and determine the impacts of the requested changes and re-present the proposed package to the CLEC community. CLEC/BST consensus will be used to create the Approved Release Package.</p> <p>6. Identify Release Management Project Manager, if possible.</p> <p>7. Establish date for initial Release Management Project Meeting for the next new release.</p> <p>8. All Change Requests that are in the approved scheduled release will be changed to "S" status for "Scheduled".</p>	<ul style="list-style-type: none"> • CLEC analysis <p>OUTPUTS:</p> <ul style="list-style-type: none"> • Approved Release Package • Updated Change Request Log • Meeting Minutes • Scheduled Change Requests • Non-Scheduled Change Requests (Return to Step 4) Balloted as a contested item. (Ballot#5) • Date for initial Release Management Project Meeting for next new release. 	<p><u>Major Rel</u> Mtg held 36 weeks prior to production</p> <p><u>Minor Rel</u>- Mtg held 19 weeks prior to production (if applicable)</p>
9	BCCM	<p><u>CREATE RELEASE PACKAGE NOTIFICATION</u></p> <p>1. Develop and distribute Release Notification Package via web.</p>	<p>INPUTS:</p> <ul style="list-style-type: none"> • Approved Release Package <p>OUTPUTS:</p> <ul style="list-style-type: none"> • Release Package Notification 	2 Bus Days after Release Package Mtg.
10	BCCM (Project Managers from each participating	<p><u>RELEASE MANAGEMENT AND IMPLEMENTATION</u></p> <p>1. Provide Project Management and Implementation of Release (See Release Management @ Appendix B).</p> <p>2. Lead Project Manager communicates</p>	<p>INPUTS:</p> <ul style="list-style-type: none"> • Approved Release Package Notification <p>OUTPUTS:</p> <ul style="list-style-type: none"> • Project Release Status 	Ongoing

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
	company)	<p>Release Management Project status to BCCM for inclusion in Monthly Status Meetings.</p> <p>3. Software Release Notifications will be provided 30 calendar days or more in advance of the implementation date.</p> <p>4. BellSouth User Requirements for software changes will be presented to CLECs. If needed, changes will be incorporated and requirements re-baselined.</p> <p><u>Major Releases</u></p> <ul style="list-style-type: none"> Draft User Requirements for <u>major</u> software releases will be provided to the CLECs at least 36 weeks prior to production. Final User Requirements for <u>major</u> software releases will be provided to the CLECs at least 34 weeks prior to production. Final specifications (EDI specs and TAG API) for <u>major</u> software releases will be provided to the CLECs at least 10 weeks prior to production. The business rules associated with <u>major</u> software releases will be provided to the CLECs at least 8 weeks prior to production. <p><u>Industry Releases</u></p> <ul style="list-style-type: none"> Notification for the implementation of an <u>Industry</u> release will be provided at least 42 weeks prior to production. Draft User Requirements for the implementation of an <u>Industry</u> release will be provided to CLECs at least 40 weeks prior to production. Final User Requirements for the implementation of an <u>Industry</u> release will be provided to CLECs at least 35 weeks prior to production. 	<ul style="list-style-type: none"> Implementation Date Project Plan, Work Breakdown Schedule, Risk Assessment, Executive Summary, etc Implemented Change Request Draft User Requirements Final User Requirements Documentation Changes Final Specifications 	

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		<ul style="list-style-type: none"> Final EDI Specifications and TAG API for the implementation of an Industry release will be provided to the CLECs at least 10 weeks prior to production. Business rules associated with the implementation of an <u>Industry</u> release will be provided to CLECs at least 8 weeks prior to production. <p><u>Minor Releases</u></p> <ul style="list-style-type: none"> Draft User Requirements for <u>minor</u> software releases will be provided to the CLECs at least 19 weeks prior to production (if applicable). Final User Requirements for <u>minor</u> software releases will be provided to the CLECs at least 18 weeks prior to production (if applicable). Final specifications (EDI specs and TAG API) for <u>minor</u> software releases will be provided to the CLECs at least 5 weeks prior to production (if applicable). The business rules associated with <u>minor</u> releases will be provided to the CLECs at least 5 weeks prior to production (if applicable). <p>5. BellSouth Documentation changes, including business rule changes, will be provided.</p> <ul style="list-style-type: none"> All non-system impacting changes to BellSouth business rule documentation will be provided to CLECs at least 30 calendar days in advance of the effective date (excluding expedites/ defects). <p>6. Once a Change Request is implemented in a release, the status will be changed to "I" for Change Implemented.</p>		

Part 3 – Expedited Feature Process

An Expedited Feature is the inability for a CLEC to process certain types of LSR's based on the existing functionality to BellSouth's Operational Support Systems (OSS's) that are in the scope of CCP. The change request for an expedite must provide details of the business impact and will fall into one of two categories:

- A submitted defect that has been re-classified as a feature where the CLEC/BellSouth has determined should be expedited due to impact
- An ordering enhancement to an existing interface where the CLEC/BellSouth has determined should be expedited due to impact

Re-classified Defects

When a submitted defect is re-classified as a feature, the CLEC/BellSouth will be notified by Change Control in the defect validation. The CLEC will have the ability to ask BellSouth to expedite the reclassified feature by updating the Change request, marking it as an expedite and sending back to Change Control. The change request will then follow through the Types 2-5 Expedited feature process using agreed upon intervals.

Ordering Enhancement to an existing interface

A CLEC/BellSouth will also have the ability to submit a Type 2-5 change request as an expedited feature request for an ordering enhancement to an existing interface where the functionality does not currently exist in BellSouth's offered interfaces.

For both re-classified defects and enhancements to an existing interface, the rules surrounding the expedited feature request will be:

- Must be an ordering enhancement to an existing interface
- Will follow the Expedited Feature process flow described below which is based on the current Types 2-5 process flow using agreed upon intervals with the exception of Steps 4-6 which are eliminated.
- CLEC/BellSouth will be required to give impacts and the consequences for not implementing the feature in the current, next, or minor release, best effort.

Figure 4.4 provides the process flow for the expedited feature process.

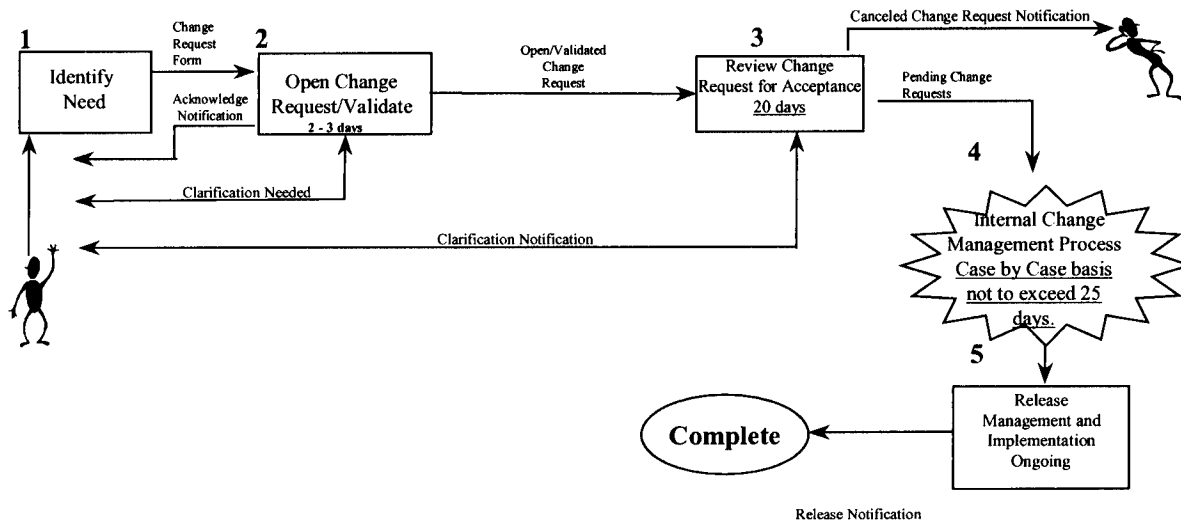


Figure 4.4 – Process Flow for Types 2-5 Expedited Feature Process

The table below details the steps, accountable individuals, tasks, inputs/outputs and cycle times of each sub-process in the expedited feature process. Steps shown in the table are sequential unless otherwise indicated.

Table 4-3. Types 2-5 Expedited Feature Detail Process Flow

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
1	CCCM BCCM	<u>IDENTIFY NEED</u> <ol style="list-style-type: none"> Internally determine need for change request. These change requests might involve system enhancements, manual and/or business process changes. Originator and CCCM or BCCM should complete the standardized Change Request Form according to Checklist. Attach related requirements and Attachment A-1A, Item 22. Appropriate CCCM/BCCM submits Change Request Form and related information via e-mail to BellSouth. 	<u>INPUTS:</u> <ul style="list-style-type: none"> Change Request Form (Attachment A-1) Change Request Form Checklist (Attachment A-1A) <u>OUTPUTS:</u> <ul style="list-style-type: none"> Completed Change Request Form with related documentation 	N/A
2	BCCM	<u>OPEN CHANGE REQUEST/VALIDATE CHANGE REQUEST FOR COMPLETENESS</u> <ol style="list-style-type: none"> Log Request in Change Request Log. Send Acknowledgement Notification (Attachment A-3) via e-mail to originator. Establish request status ('N' for New Request) Review change request for mandatory fields using the Change Request Form Checklist. Verify Change Request specifications and related information exists. Send Clarification Notification via email to the originator (Attachment A-4) if needed. Update Change Request Status to "PC" for Pending Clarification if clarification is needed. <u>CLEC or BellSouth Originator</u> If clarification is needed, make necessary corrections per Clarification Notification and submit Change Request Clarification Response (Attachment A-2).	<u>INPUTS:</u> <ul style="list-style-type: none"> Completed Change Request Form with related documentation Change Request Form Checklist Change Request Clarification Response <u>OUTPUTS:</u> <ul style="list-style-type: none"> New Change Request Acknowledgment Notification Validated Change Request Clarification Notification Industry Notification via e-mail and web posting 	1 Bus Day Clarification times would be in addition to cycle time.

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
3	BCCM	<p><u>REVIEW CHANGE REQUEST FOR ACCEPTANCE</u></p> <ol style="list-style-type: none"> Review Change Request and related information for content. Change Request reviewed for impacted area (i.e., system, manual process, documentation) and adverse impacts. Determine status of request: <ul style="list-style-type: none"> If change already exists or CLEC training issue, forward Cancellation Notification (Attachment A-3) to CCCM or BCCM and update status to 'C' for Request Canceled or 'CT' for Training. If Training issue, refer to CSM or Account Team. If Change Request Clarification Notification not received, validate with CLEC that change request is no longer needed. If request is accepted, update Change Request status to "P" for Pending in Change Request Log. If request does not meet the expedited feature criteria, it will exit this process and enter the standard Types 2-5 flow, Step 4. <p>NOTE: See Section 11.0 Terms and Definitions – Change Request Status for valid status codes and descriptions.</p> <p>BellSouth may determine that a CLEC initiated change request cannot be accepted because of cost, industry direction or because it is considered not technically feasible to implement. If requested, the appropriate BST SME will participate in the Monthly Status Meeting to address the reason for rejection and discuss alternatives with the CLEC community. The SME must be provided a minimum of two-week advance notice to participate in the upcoming Monthly Status Meeting.</p>	<p><u>INPUTS:</u></p> <ul style="list-style-type: none"> New Change Request Validated Change Request Clarification Notification (if required) <p><u>OUTPUTS:</u></p> <ul style="list-style-type: none"> Validated Expedited Change Request Clarification Notification (if required) Cancellation Notification (if required) CR status updated on web 	20 Bus Days

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
4	BCCM CCCM	<p><u>INTERNAL CHANGE MANAGEMENT PROCESS</u></p> <ol style="list-style-type: none"> Both BellSouth and CLECs will perform analysis, impact, sizing and estimating activities to the Expedited Feature Change Request. This ensures that participating parties are reviewing capacity and impacts to schedules before assigning resources to activities. <p>Expedited Features will be implemented in the current, next release, or minor release, best effort.</p>	<p><u>INPUTS:</u></p> <ul style="list-style-type: none"> Change Request Log <p><u>OUTPUTS:</u></p> <ul style="list-style-type: none"> Release Date for Expedited Feature 	Case by case basis – not to exceed 25 days.
5	BCCM (Project Managers from each participating company)	<p><u>RELEASE MANAGEMENT AND IMPLEMENTATION</u></p> <ol style="list-style-type: none"> Provide Project Management and Implementation of Release (See Release Management @ Appendix B). Lead Project Manager communicates Release Management Project status to BCCM for inclusion in Monthly Status Meetings. BellSouth User Requirements for software changes will be presented to CLECs, if applicable. If needed, changes will be incorporated and requirements re-baselined. BellSouth Documentation changes, including business rules changes associated with expedited features, will be provided if applicable. Once a Change Request is implemented in a release, the status will be changed to “I” for Change Implemented. 	<p><u>INPUTS:</u></p> <ul style="list-style-type: none"> Approved Release Package Notification <p><u>OUTPUTS:</u></p> <ul style="list-style-type: none"> Project Release Status Implementation Date Documentation Changes 	Ongoing

5.0 DEFECT PROCESS

A CLEC/BST identified defect will enter this process through the Change Management Team as a Type 6 Change Request. If the defect is validated internally, it will route through this process, and notification provided to the CLEC community via e-mail and web posting.

A Type 6 defect request is any non-type 1 change that corrects problems discovered in production versions of an application interface. These problems are where the interface is not working in accordance to the BellSouth baseline user requirements or the business rules that BellSouth has published or otherwise provided to the CLECs.

In addition, if functional requirements agreed upon by BellSouth and the CLECs, results in inoperable functionality, even though software user requirements and business rules match; this will be addressed as a defect.

These problems typically affect the CLEC's ability to exchange transactions with BellSouth and may include documentation that is in error, has missing information or is unclear in nature (See Documentation Defect Sub-section 5-2).

Type 6 validated defects may not be managed using the Expedited Feature Process as discussed in Section 4, Part 3.

Defect Change Requests will have three Impact Levels (excluding documentation defects):

- **High Impact**

The failure causes impairment of critical system functions and no electronic workaround solution exists.

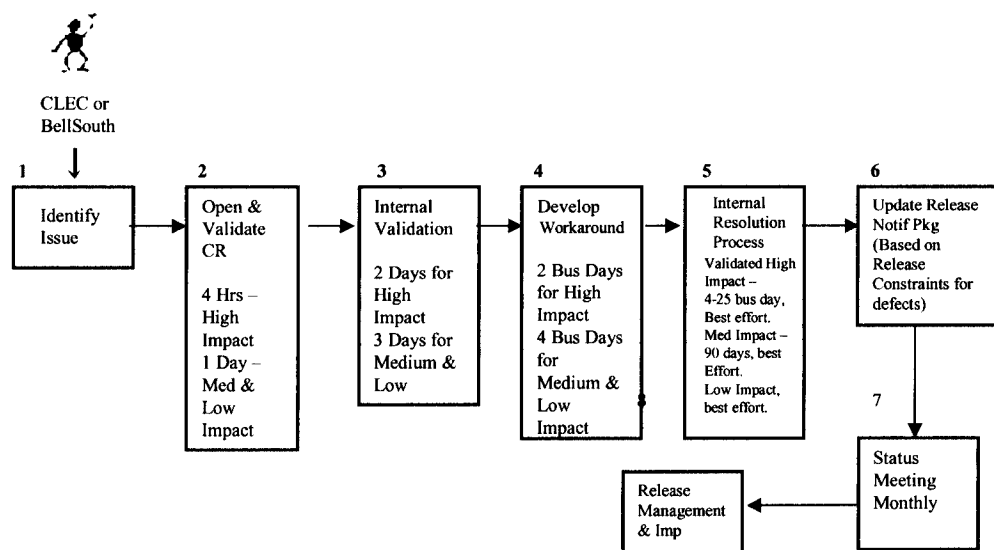
- **Medium Impact**

The failure causes impairment of critical system functions, though a workaround solution does exist.

- **Low Impact**

The failure causes inconvenience or annoyance.

Figure 5-1 provides the process flow for the validation and resolution of a Type 6 Change – CLEC Impacting Defects (excluding documentation).



NOTE: The intervals in the boxes above match the intervals in the tables below for High, Medium, and Low Impact defect change requests.

Figure 5-1. Type 6 Process Flow

The table below details the steps, accountable individuals, tasks, inputs/outputs and cycle times of each sub-process in the Type 6 Process Flow. This process will be used to validate defects, provide status notification(s), workarounds and final resolution to the CLEC community. Steps shown in the table are sequential unless otherwise indicated. (This table excludes documentation defects which are detailed in a separate section 5-2)

Table 5-1. Type 6 Detail Process Flow

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
1	CCCM BCCM	<u>IDENTIFY NEED</u> <ol style="list-style-type: none"> Identify Defect. Originator and CCCM or BCCM should complete the standardized Change Request Form indicating that it is a Type 6. Include description of business need and details of business impact. Attach related requirements and specification documents. These attachments must include the following, if appropriate: <ul style="list-style-type: none"> PON OCN Specific Scenario Interface(s) affected Error message (if applicable) Release or API version (if applicable) Appropriate CCCM/BCCM submits Change Request Form and related information via e-mail to BellSouth Change Management Team. 	<u>INPUTS:</u> <ul style="list-style-type: none"> Type 6 Change Request <u>OUTPUTS:</u> <ul style="list-style-type: none"> Completed Change Request Form (with related documentation if necessary) 	N/A
2	BCCM	<u>OPEN & VALIDATE DEFECT FORM FOR COMPLETENESS</u> <ol style="list-style-type: none"> Log Defect in Change Request Log. Send Acknowledgment Notification via email to initiating CLEC. Establish CR status ('N' for New Defect) BCCM reviews change request for mandatory fields using the Change Request Form Checklist. Verify specifications and related information exists. 	<u>INPUTS:</u> <ul style="list-style-type: none"> Completed Change Request Form (with related documentation if necessary) <u>OUTPUTS:</u> <ul style="list-style-type: none"> New Defect Acknowledgment Notification Clarification Notification (if required) 	4 Hours for High Impact 1 Bus Day for Medium and Low Impact (Time to be calculated from time of receipt with a cutoff time of

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		<p>6. Send Clarification Notification via email to the originator if needed.</p> <p>7. Update CR status to "PC" for Pending Clarification if clarification is needed.</p> <p>If clarification is needed, CLEC or BST originator makes necessary corrections per Clarification Notification and submits via email Change Request Clarification Response.</p>		4:00 PM Eastern Time)
3	BCCM	<p>INTERNAL VALIDATION</p> <ol style="list-style-type: none"> 1. Validate that it is a defect. 2. Perform internal defect analysis. 3. <u>Determine status of request:</u> <ul style="list-style-type: none"> • If change already exists or CLEC training issue, forward Cancellation Notification to CCCM or BCCM and update status to 'C' for Request Canceled or 'CT' for Training. If Training issue, refer to CSM or Account Team. • Send Clarification Notification via email if needed and update status to 'PC' for Pending Clarification. • If Change Request Clarification Notification not received, validate with CLEC that change request is no longer needed. • If request is valid, update Change Request status to 'V' for Validated Defect and indicate appropriate Impact Level. • If CLEC does not agree with the validation, the CLEC may appeal the issue or escalate. • Based on detail analysis, BellSouth will reaffirm the impact level that is stated on the request. <ul style="list-style-type: none"> • If the process is operating as specified in the baselined requirements and published business rules, the BCCM will communicate the results via e-mail to the originator to discuss/determine the next step(s). 	<p>INPUTS:</p> <ul style="list-style-type: none"> • New Defect <p>OUTPUTS:</p> <ul style="list-style-type: none"> • Validated Defect • Defect notification to CLEC community via e-mail and web posting • Clarification Notification (if required) • Cancellation Notification (if required) • Status provided for High Impact Defects to originator via email within 24 hours. 	<p>2 Bus Days for High Impact</p> <p>3 Bus Days for Medium & Low Impact</p>

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		<ul style="list-style-type: none"> If issue is re-classified as a feature change, provide supporting information via email to the originator for review and feedback. The Change Request will exit the defect process flow and enter Types 2-5 process flow (enter at Step 3). <p>NOTE: See Section 11.0 Terms and Definitions – Defect Status for valid status codes and descriptions.</p> <p>Defect notification will be provided to CLEC community via e-mail and web posting.</p>		
4	BCCM	<p><u>DEVELOP AND VALIDATE WORKAROUND (IF APPLICABLE)</u></p> <ol style="list-style-type: none"> Defect workaround identified. Change Request status changed to “W” for workaround identified. Workaround is communicated via e-mail to originating CLEC and to the CLEC community via email and web posting. If appropriate, communication to the CLEC community regarding workaround will be discussed via conference call. <p>If it is determined that additional time is needed to develop workaround due to the complexity of the defect, notification will be provided to CLEC community via e-mail and web posting.</p>	<p><u>INPUTS:</u></p> <ul style="list-style-type: none"> Validated Defect Clarification Notification (if required) <p><u>OUTPUTS:</u></p> <ul style="list-style-type: none"> Workaround (if applicable) Clarification Notification (if required) Cancellation Notification (if required) E-mail and web posting of workaround 	<p>2 Bus Days for High Impact</p> <p>4 Bus Days for Medium and Low Impact</p>
5	BCCM	<p><u>INTERNAL RESOLUTION PROCESS</u></p> <ol style="list-style-type: none"> Schedule and evaluate Defects based on capacity and business impacts to the CLECs and BellSouth. Provide status updates to the CLEC community via email as the status changes until the defect is implemented. 	<p><u>INPUTS:</u></p> <ul style="list-style-type: none"> CLEC/ BST input <p><u>OUTPUTS:</u></p> <ul style="list-style-type: none"> Defect Release Schedule 	<p>Monthly or when status changes, whichever occurs first.</p> <p><u>Validated High and Medium Impact defects</u></p>

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
				<p>will be implemented within a 4 – 10 business day range, best effort.</p> <p>Validated High Impact Defects will be implemented within a 4-25 business day range, best effort.</p> <p>Medium Impact Defects will be implemented within 90 days, best effort.</p> <p>Low Impact defects will be implemented best effort.</p> <p>Low Impact defects will be implemented within a 4 – 20 business day range, best effort.</p> <p>(REMOVE)</p> <p><i>Balloted as a contested item (Ballot #1). BST cannot support requested intervals.</i></p>
6	BCCM	<p>UPDATE RELEASE PACKAGE NOTIFICATION</p> <p>1. Update and distribute release</p>	<p>INPUTS:</p> <ul style="list-style-type: none"> Defect Information 	Based on release constraints for

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		<p>notification package via web.</p> <p>2. All Change Requests that are in the approved scheduled release will be changed to "S" status for "Scheduled".</p> <p>Note: The release notification will be published in a timely manner, based on the release constraints associated with the defect.</p>	<p>OUTPUTS:</p> <ul style="list-style-type: none"> Updated Release Package Notification Scheduled Change Request 	defects (may be less than 30 days).
7	BCCM	<p>MONTHLY STATUS MEETING</p> <ol style="list-style-type: none"> Provide status of Defect Solicit CLEC/BellSouth input Update Defect information as needed. 	<p>INPUTS:</p> <ul style="list-style-type: none"> Defects Received Change Request Log Defect Analysis Workaround (if applicable) <p>OUTPUTS:</p> <ul style="list-style-type: none"> Updated status Updated Change Request Log Meeting minutes 	Monthly or when status changes, whichever occurs first.
8	BCCM	<p>RELEASE MANAGEMENT AND IMPLEMENTATION</p> <p>The following release management activities will pertain to Type 6 changes:</p> <ol style="list-style-type: none"> Lead project manager communicates release management project status to BCCM for inclusion in Monthly status meetings. Once a defect is implemented in a release, the status will be changed to "I" for Change Implemented. 	<p>INPUTS:</p> <ul style="list-style-type: none"> Approved Release Package Notification <p>OUTPUTS:</p> <ul style="list-style-type: none"> Project Release Status Implementation Date Implemented Change Request 	Ongoing

Table 5-2. Type 6 Detail Process Flow – Documentation Defects

The table below details the steps, accountable individuals, tasks, inputs/outputs and cycle times of each sub-process in the Type 6 Process Flow for documentation defects. This process will be used to validate documentation defects, provide status notification(s), and final resolution to the CLEC community. Steps shown in the table are sequential unless otherwise indicated.

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
1	CCCM BCCM	<u>IDENTIFY NEED</u> <ol style="list-style-type: none"> 1. Identify Documentation Defect. 2. Originator and CCCM or BCCM should complete the standardized Change Request Form indicating that it is a Type 6. 3. Include description of business need and details of business impact. 4. Attach related requirements and specification documents, if appropriate. 5. Appropriate CCCM/BCCM submits Change Request Form and related information via e-mail to BellSouth Change Management Team. 	<u>INPUTS:</u> <ul style="list-style-type: none"> • Type 6 Change Request <u>OUTPUTS:</u> <ul style="list-style-type: none"> • Completed Change Request Form (with related documentation if necessary) 	N/A
2	BCCM	<u>OPEN & VALIDATE DEFECT FORM FOR COMPLETENESS</u> <ol style="list-style-type: none"> 1. Log Defect in Change Request Log. 2. Send Acknowledgment Notification via email to initiating CLEC. 3. Establish CR status ('N' for New Defect) 4. BCCM reviews change request for mandatory fields using the Change Request Form Checklist. 5. Verify specifications and related information exists. 	<u>INPUTS:</u> <ul style="list-style-type: none"> • Completed Change Request Form (with related documentation if necessary) <u>OUTPUTS:</u> <ul style="list-style-type: none"> • New Documentation Defect • Acknowledgment Notification • Clarification Notification (if required) 	1 Bus Day
3	BCCM	<u>INTERNAL VALIDATION</u> <ol style="list-style-type: none"> 1. Validate that it is a documentation defect. 2. Perform internal defect analysis. 3. Determine status of request: <ul style="list-style-type: none"> • If change already exists or CLEC training issue, forward Cancellation Notification (Attachment A-3) to CCCM or BCCM and update status to 	<u>INPUTS:</u> <ul style="list-style-type: none"> • New Documentation Defect <u>OUTPUTS:</u> <ul style="list-style-type: none"> • Validated Documentation Defect • Defect notification to CLEC community via e-mail and web posting 	3 Bus Days

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		<p>'C' for Request Canceled or 'CT' for Training. If Training issue, refer to CSM or Account Team.</p> <ul style="list-style-type: none"> Send Clarification Notification via email if needed and update status to 'PC' for Pending Clarification. If Change Request Clarification Notification not received back from CLEC, validate with CLEC that change request is no longer needed. If request is valid, update Change Request status to 'V' for Validated Defect and indicate appropriate Impact Level. If CLEC does not agree with the validation, the CLEC may appeal the issue or escalate. Based on detail analysis, BellSouth will reaffirm the impact level that is stated on the request. <ul style="list-style-type: none"> If the documentation is correct, the BCCM will communicate the results via e-mail to the originator to discuss/determine the next step(s). <p>NOTE: See Section 11.0 Terms and Definitions – Defect Status for valid status codes and descriptions.</p> <p>Defect notification will be provided to CLEC community via e-mail and web posting.</p>	<ul style="list-style-type: none"> Clarification Notification (if required) Cancellation Notification (if required) 	
4	BCCM	<p><u>DEVELOP AND PROVIDE CARRIER NOTIFICATION “SUMMARY OF CHANGES”</u></p> <ol style="list-style-type: none"> BellSouth prepares and validates the corrected documentation. Carrier Notification “Summary of Changes” is developed. Change Request status changed to “S” for scheduled. Carrier Notification “Summary of 	<p><u>INPUTS:</u></p> <ul style="list-style-type: none"> Validated Documentation Defect Clarification Notification (if required) <p><u>OUTPUTS:</u></p> <ul style="list-style-type: none"> Workaround (if applicable) Clarification Notification (if required) 	4 Bus Days

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		<p>Changes” is sent to B CCM via email for distribution to CLECs.</p> <p>If it is determined that additional time is needed to develop workaround due to the complexity of the defect, notification will be provided to CLEC community via e-mail and web posting.</p>	<ul style="list-style-type: none"> • Cancellation Notification (if required) • E-mail of “Summary of Changes” notification 	
5	BCCM	<p>CARRIER NOTIFICATION LETTER</p> <ol style="list-style-type: none"> 1. BellSouth will develop an “official” Carrier Notification Letter. 2. Carrier Notification Letter is posted to the web. 	<p>INPUTS:</p> <ul style="list-style-type: none"> • Carrier Notification “Summary of Changes” <p>OUTPUTS:</p> <ul style="list-style-type: none"> • Carrier Notification Letter posted on web 	10 Bus Days

6.0 CHANGE REVIEW – PRIORITIZATION – RELEASE PACKAGE DEVELOPMENT AND APPROVAL

Part 1 – Change Review Meeting

The Change Review meeting provides the forum for reviewing and prioritizing Pending Change Requests, generating Candidate Change Requests, submitting Candidate Change Requests for sizing, and reviewing the status of all release projects underway. Status update meetings will be held monthly and are open to all CLEC's. Meetings will be structured according to category (pre-order/order, maintenance, manual and documentation, etc.). Prioritization meetings will be held quarterly.

During the Change Review Meeting each originator of a Change Request will be allowed 5 (five) minutes to present their Change Request. A question and answer session not to exceed 15 minutes will follow this presentation. After all presentations for a particular category are complete, the prioritization process will begin.

The Change Request Log will be distributed 5 - 7 (five to seven) business days prior to the Change Review meeting. A valid and complete Change Request must be received 30 business days prior to the Change Review Meeting. Change Requests must be accepted and in "Pending" status to be placed on the agenda for the next scheduled meeting.

Note: Status Meetings will occur monthly. Prioritization meetings will be scheduled to occur in March, June, September and December and will include the monthly status meeting agenda items.

Part 2 – Change Review Package

The Change Review Package will be distributed to all participants 5 – 7 (five to seven) business days prior to the Change Review meeting. The package will include the following:

- Meeting Notice
- Agenda
- Change Request Log (List of Change Requests to be reviewed)
- BellSouth's preliminary estimate of the size and scope of each Change Request.
- Schedule of releases and capacity in each **(BellSouth cannot support providing capacity information)**
Balloted as a contested item (Ballot #5).

-
- Reference to Change Control Process on the BST website (for CLECs not familiar with the process, new CLECs or CLECs that choose to participate after the initial rollout)
 - Status Reports from each of the active Release Management Project Teams

Part 3 – Prioritizing Change Requests

Prior to the Change Review Meeting, each participating CLEC should determine priorities for change requests and establish “desired/want” dates. The CLEC should use the Preliminary Priority List form as provided via the web.

Final prioritization will be determined at the Change Review meeting after presentation of the Change Requests for each category.

Prioritization Voting Rules

- CLEC must either be using an interface within a category (i.e. ordering), in the testing phase or have a letter of intent on file with the BellSouth Change Control Management Team to participate in the voting process
- One vote per CLEC, per category
- No proxy voting
- Types 3, 4 and 5 change requests will be prioritized (non-expedites).
- Each company may bring the number of participants necessary to represent their position. If the number of participants grows to be unmanageable, CLECs and BellSouth will revisit the issue of representation to apply some restrictions.
- Forced Ranking (1 to N, with 1 being the highest) will be used
- CLECs may choose to vote “no” on change requests that may potentially negatively impact its business or have little value to the CLEC. If a majority of CLECs vote “no” on any certain change request, that request will not be implemented.
- Votes will be tallied to determine order of ranking
- Changes will be ranked by category
- Manual processes and documentation changes will be prioritized separately; however they will need to be synchronized with the electronic interface changes.
- In case of a tie, the affected Changes will be re-ranked and prioritized based on the re-ranking

Example: The top 2 Changes from high to low are E5 and E2, with E1 and E4 tied for 3rd. E1 and E4 would be re-ranked and prioritized according to the re-ranking.

Pre-Order LENS	CLEC 1	CLEC 2	CLEC 3	Total
E1	3	1	6	10
E2	3	5	1	9 (#2)
E3	1	6	5	12
E4	4	3	3	10
E5	2	2	3	7 (#1)
E6	6	3	2	11

Part 4 – Developing and Approving Release Packages

Subsequent to the Change Review Meeting, BellSouth and the CLECs will each evaluate and analyze the Candidate Change Requests in preparation for the Release Package Meeting that will be held as follows:

- Major Release – 36 weeks prior to production
 - Minor Release – 19 weeks prior to production (if applicable)
-
- Sizing and sequencing of change requests will be accomplished at the Prioritization Meeting. CLECs may take into account the size and scope when prioritizing items.

- BellSouth will develop several variations of release packages to include all of the prioritized requests.
(1-10-01) BellSouth will develop and present two scenarios for the next release. Based on group consensus at the Release Package Meeting, the determination will be made as to which scenario should be implemented. BST/CLEC consensus will be used to create the Approved Release Package and schedule (open item).
(2-16-01) At a minimum, a target release date will be provided for the top five (5) change requests, which could include the next and/or future release (rejected by CLEC community on 2-21-01).
(4-20-01) All candidate requests will be considered for the next two releases (rejected by CLEC community on 4-25-01).
(5-18-01) All candidate requests will be considered for the upcoming release (open item).
- All Candidate Change Requests will be assigned to as many future releases as necessary to complete the assignment process.

(1-10-01) BellSouth to propose two (2) scenarios: 1) Unscheduled change requests will need to be re-prioritized at the next Change Review Meeting along with the new pending requests to accommodate changes in the "Industry's business requirements or 2) Prioritize only the new "Pending" CR's since the last Change Review Meeting. Rankings will be incorporated into the overall prioritization list. CLECs, based on group consensus, may request re-ranking of all non-scheduled CR's (open item).

(2-16-01) At a minimum, a target release date will be provided for the top five (5) change requests, which could include the next and/or future release. Non-scheduled change requests will be combined with new pending requests and re-ranked quarterly to ensure a current list of priorities is always available. This includes any of the top 5 items that may not be scheduled for a release (rejected by CLEC community on 2-21-01).

(4-20-01) All candidate requests will be considered for the next two releases (rejected by CLEC community on 4-25-01).

(5-18-01) All candidate requests will be considered for the upcoming release (open item).

During the Release Package Meeting, BellSouth will present its proposed release package for the next release. CLEC/BST consensus will be used to create the Approved Release Package. CLECs, based on group consensus, may request changes to the proposed scope (like for like-size CRs). BellSouth will evaluate and determine the impacts of the requested changes and re-present the proposed package to the CLEC community. CLEC/BST consensus will be used to create the Approved Release Package.

(2-16-01) Change Requests may not be implemented in priority order due to the complexity of the Change Request, the relationship between the implementation of one change and changes specified in other Change Requests, and other factors. Implementation decisions will remain with BellSouth's discretion, consistent with applicable law and regulatory authority and resource constraints. BellSouth will consider the prioritization in exercising this discretion. (2-21-01 CLEC questioned last two sentences)

(4-20-01) Change Requests may not be implemented in priority order due to either the complexity of the Change Request or the dependency of Change Requests. Supporting documentation will be provided to explain why Change Requests can't be implemented in priority order. Implementation decisions will remain within BellSouth's discretion, consistent with regulatory mandates and resource constraints. BellSouth will consider the prioritization in exercising this discretion. (6-14-01 open item. WorldCom to submit CLEC recommended language.)

7.0 INTRODUCTION AND RETIREMENT OF INTERFACES

Introduction of New Interfaces

BellSouth will introduce new interfaces to the CLEC Community as part of the Change Control Process. BellSouth will seek to conform to the notification process for Type 4 (BellSouth Originated) changes as described in this document. In the event that BellSouth is forced to deviate from the Type 4 (BellSouth originated) process for new non-impacting interface functionality, BellSouth will notify all CLECs of the deviation as promptly as possible. A description of the proposed interface will be submitted to the BCCM. The BCCM will add an agenda item to discuss the new interface at the monthly status meeting. BellSouth will be given 30-45 minutes to present information on the proposed interface. If BellSouth requests additional time for the presentation, a separate meeting will be scheduled to review the proposed interface, so that, the information can be presented in its entirety. The objective will be to identify interest in the new interface and obtain input from the CLEC community. BellSouth will provide specifications on the interface being developed to the CLEC community. As new interfaces are deployed, they will be added to the scope of this document, as appropriate, based on the use by the CLEC and requested changes will be managed by this process.

Retirement of Interfaces

As active interfaces are retired, BellSouth will notify the CLECs through the Change Control Process and post a CLEC Notification Letter to the web six (6) months prior to the retirement of the interface. BellSouth will have the discretion to provide shorter notifications (30-60 days) on interfaces that are not actively used and/or have low volumes. BellSouth will consider a CLEC's ability to transition from an interface before it is scheduled for retirement. BellSouth will ensure that its transition to another interface does not negatively impact a CLEC's business.

BellSouth will only retire interfaces if an interface is not being used, or if BellSouth has a replacement for an interface that provides equal or better functionality for the CLEC than the existing interface.

Retirement of Versions

When software versions are retired, BellSouth will give the CLECs a 120 day notification.

A CLEC may respond to Change Control with its desire to extend a retirement date. The CLEC must explain why the scheduled retirement date is not acceptable by providing the impact to its business.

8.0 ESCALATION PROCESS

Guidelines

- The ability to escalate is left to the discretion of the CLEC based on the severity of the missed or unaccepted response/resolution.
- Escalations can involve issues related to the Change Control process itself.
- For change requests, the expectation is that escalation should occur only after normal Change Control procedures (e.g. communication timelines) have occurred per the Change Control agreement.
- Three levels of escalation will be used.
- For Type 1 issues, the escalation process is agreed to allow BellSouth a one-day turnaround for each cycle of escalation.
- For Types 2-5 issues, the escalation process is agreed to allow BellSouth a five-day turnaround for each cycle of escalation.(Excludes Expedites)
- For Type 6 High Impact issues, the escalation process is agreed to allow BellSouth a one (1) day turnaround to provide a status for each cycle of escalation. For Type 6 Medium and Low Impact issues, the escalation process is agreed to allow BellSouth a two (2) to five (5) day turnaround to provide a status for each cycle of escalation.
- For Types 2-5 Expedite Process issues, the escalation process is agreed to allow BellSouth a three (3) day turnaround to provide a status for each cycle of escalation.
- Each level will go through the same Cycle, which is described below.
- All escalation communications may be optionally distributed by the CLEC to the industry and BellSouth Change Control e-mail unless there is a proprietary issue.

Cycle for Type 1 System Outages

Contact List for Escalation - ECS Group - Type I Changes

If the originator does not receive a call back from the EC Support Group according to the times specified in this document, they may escalate according to the following list:

Escalation Level	Name and Title	Office Number	Pager Number	Email Address
1st Level	Byron Franklin Manager - EC Support Group Interconnection Operations	205-733-5400	1-800-862-0399 PIN 17264913	Byron.Franklin@bridge.bellsouth.com
2nd Level	Bruce Smith Operations Director - EC Support Group Interconnection Operations	205-988-7211	1-800-542-3260	Bruce.Smith@bridge.bellsouth.com
3rd Level	Lynn Smith Operations AVP Interconnection Operations	205-714-0010	N/A	Lynn.A.Smith@bridge.bellsouth.com Lsmith12@imcingular.com

NOTE: If a call is escalated without first attempting to contact the ECS Helpdesk, the caller will be referred back to the ECS Helpdesk.

Escalation Cycle for Types 2-6 Change Requests

- Item must be formally escalated as an e-mail sent to the appropriate escalation level within BellSouth with a copy to the industry and BellSouth Change Control e-mail.
- Subject of e-mail must be CLEC (CLEC Name) ESCALATION-CR#, if applicable, Level of Escalation, unless it is proprietary.
- Content of e-mail must include:
 - Definition and escalation of item.
 - History of item.
 - Reason for escalation.
 - Desired outcome of CLEC.
- Impact to CLEC of not meeting the desired outcome or item remaining on current course of action as previously discussed at the Change Control Meeting for enhancements.
- Contact information for appropriate Level including Name, Title, Phone Number, and E-mail ID.
- For escalation Level 2, forward original e-mail and include any additional information including the reason that the matter could not be resolved at Level 1.
- For escalation Level 3, forward original e-mail and include any additional information including the reason that the matter could not be resolved at Levels 1 and 2.
- BellSouth will reply to escalation request with acknowledgement of receipt within 4 hrs and begin the escalation process through Level of escalation.
- The escalating CLEC should respond to BellSouth within 5 days as to whether escalation will continue or the BellSouth response has been accepted as closure to the item.
- If the BellSouth position suggests a change in the current disposition of the item (i.e., what has already been communicated to the industry), a conference call will be held within 1 business day of the BellSouth decision in order to provide industry notification with the appropriate executives.
- BellSouth will publish the outcome of the conference call to the industry via web.

- If unsatisfied with an outcome, either party can seek appropriate relief.

Contact List for Escalation - Type 2 - 6 Changes

Escalations should be made according to the following list.

Escalation Level	Name and Title	Office Number	Email Address
1st Level	Valerie Cottingham Director Change Control Process	205-321-2168	Valerie.cottingham@bridge.bellsouth.com
2nd Level	Dennis Davis Director (Encore Solution Delivery, Test Bed, User Requirements, CCP)	205-977-1103	Dennis.L.Davis@bridge.bellsouth.com
	Joy Lofton Director (for Business Rules/Operations Issues)	404-927-7828	Joy.A.Lofton@bridge.bellsouth.com
	Suzie Lavett Director (TAG/LENS)	205-977-2876	Suzie.H.Lavett@bridge.bellsouth.com
	Audrey Thomas Director (EDI)	404-927-7886	Audrey.Thomas@bridge.bellsouth.com
	Al Bolden Director (LNP)	404-927-7011	Al.Bolden2@bridge.bellsouth.com
3rd Level	Doug McDougal Senior Director (Systems Issues, Test Bed, User Requirements)	404-927-7505	Doug.McDougal@bridge.bellsouth.com

	Dee Freeman-Butler Senior Director (for Business Rules/Operations Issues)	404-927-3545	<u>Dee.Freeman2@bridge.bellsouth.com</u>
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Dispute Resolution Process

In the event that an issue is not resolved through the Escalation Process as described herein, including (1) escalation within each company to the person with ultimate authority for Change Control operations, and (2) the services of a joint investigative team, when appropriate, comprised of representatives from BellSouth and the affected CLECs. Resolution of the dispute shall be accomplished as set forth below:

- Either BellSouth or any CLEC affected by the dispute may request mediation through the State Public Service Commission, if available. If mediation is requested, parties shall participate in good faith. If the mediation results in the resolution of the dispute, that resolution shall apply to all CLECs affected by the dispute.
- Without necessity for prior mediation, either BellSouth or any CLEC affected by the dispute may file a formal complaint with the appropriate state regulatory agency, requesting resolution of the issue.

9.0 CHANGES TO THIS PROCESS

The current, approved version of this process document will be stored under the component name "Ccp.doc" (the date of the latest CCP document will be included in the file name). The BellSouth Change Control Manager BCCM (and alternate) will be the only persons authorized to update the document version.

Requests for changes to the Change Control Process may be submitted to the BellSouth Change Control Manager (BCCM) using the Change Request form located in the Appendix A. Cosmetic changes (format, typographical errors, clarifications of meaning, etc.) may be made and published by the BCCM (or alternate) without further review. Other changes will be reviewed at the monthly Change Review status meetings following receipt of the request, if included in the published meeting agenda. The CCP participants present at the meeting (in person or by teleconference) will reach an initial determination regarding the requested change(s) by "consensus". For this purpose consensus will mean that no participant has serious objection to the determination of the group. The following initial determinations may be applied:

- Meeting Consensus (BellSouth and the other meeting participants have no serious objection to the change. The change will be balloted for Industry Consensus with the indication that a meeting consensus was reached.)
- Contested Issue (BellSouth and the other meeting participants are unable to reach consensus and the proposals of the parties are firm. The proposals will be balloted for Industry Consensus and the structure of the ballot will indicate that a choice between alternatives must be made.)
- Not Ready for Balloting (BellSouth and the other meeting participants are unable to reach consensus and the proposals of the parties are not firm. The request will not be balloted and will remain open for review during subsequent monthly meetings. The CCP participants will continue to use the associated current change control process. Working documentation reflecting both the current and proposed language may be created to facilitate further discussion.)
- Implement as Cosmetic (BellSouth and the other meeting participants determine that the requested change is a clarification of meaning with no potential negative impact. The change will be implemented and the Change Request will be updated to implemented status and update distributed as per the normal process.)

Subsequent to this initial review the BCCM and a CLEC representative appointed by the CLECs participating in the review shall prepare an official E-mail ballot for distribution to determine the Industry Consensus. The official Industry Consensus ballot will detail the change(s) being requested, and the significant arguments presented for and against the change during the review. As noted above, the ballot will indicate whether issues are being voted upon as the result of a Meeting Consensus or as a Contested Issue. Each issue presented on the ballot will contain a statement of the change to be approved and in the case of a Contested Issue, a summary of arguments for and arguments against the alternatives. The ballot will be distributed one week following the Status Meeting. CLEC's will have one week in which to cast their votes. Only ballots transmitted before midnight of the due date will be counted. Each CLEC is allowed one vote on each issue presented on the ballot. The CCCM, or other designated individual will cast each CLEC's votes.

The ballot (a sample ballot may be found in the Appendix) will allow CLECs to indicate their agreement or disagreement with the proposed change across a five-step continuum as shown here:

A	B	C	D	E
Agree	Generally Agree	Neutral	Somewhat Disagree	Disagree

When a Contested Issue is presented on the ballot, there will be a continuum for each of the alternatives and the voter must disagree with one (and only one) of the two.

Industry Consensus will exist and the change will be implemented whenever two-thirds of votes cast by the due date are cast in categories A through D. BellSouth may not be able to support all requested changes to the process as proposed. BellSouth will provide a supporting reason(s) to substantiate its position. A CLEC may seek relief through the escalation process if dissatisfied with BellSouth's response. No consensus will exist if over 1/3 of votes for a change are cast in category E –“disagree”.

10.0 TESTING ENVIRONMENT

BellSouth offers Interface and Functional testing to CLECs for the Telecommunications Access Gateway (TAG) and Electronic Data Interchange (EDI) interfaces. The testing opportunities offered are as follows:

- **CLEC Interface Testing** – Testing for CLECs implementing a new interface, product or release.
- **Functional Testing** – Testing conducted in the CLEC Application Verification Environment (CAVE), where CLECs can opt to do further functional testing, or testing to implement a new release.

Test Phases

The following defines the different phases of testing supported by BellSouth:

- **Physical Connectivity Testing** – This required phase of testing verifies communication is properly established and that both parties can send and receive electronic messages. Applicable to LAN users only.
- **Application Connectivity Testing** – This required phase of testing verifies communication is properly established between BellSouth platforms and CLEC specified connectivity methods such as:
 - EDI – VAN or CONNECT:Direct®
 - TAG
- **API Testing** – This optional phase of testing allows the CLEC to verify their software before Application Testing. No test cases are provided and testing is done against the simulator. This phase of testing applies only to CLECs using TAG.
- **Application Testing** – This conditional phase of testing uses a simulator and verifies that the mapping of data is correct and the CLEC software can communicate with BellSouth. This phase is required for TAG users when implementing a new interface, new TCIF Issue or new product. This phase of testing verifies Pre-ordering and Ordering data mapping.
- **Syntax Testing** – This phase of testing verifies compliance to predetermined structures such as ANSI ASC X12 EDI standards and TCIF industry standards. This phase of testing is required when implementing a new EDI interface or moving to a new EDI map.

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- **Validity Testing** – This phase of testing verifies that the CLEC software can execute firm order test cases in compliance with the BellSouth Business Rules. This phase of testing is required when implementing a new interface, new product, or new TCIF Issue.
 - **Production Verification Testing** – This required phase of testing allows BellSouth and CLECs to confirm that transactions flow to the production environment. CLECs are required to submit a production transaction with live data. BellSouth will monitor to ensure that back-end applications can be accessed.
 - **Service Readiness Testing** – This phase of testing only applies if it is included in the CLEC's Interconnection Agreement. This optional phase of testing allows a CLEC to test firm orders end-to-end. This is in BellSouth production environment.
 - **Functional Testing** – This optional phase of testing, conducted in CAVE, allows a CLEC to perform functional testing for ordering on pre-production and post-production releases during the specified period. CLECs may choose to do additional functional testing in CAVE after other phases of testing are complete, or they may use CAVE for new release Functional testing in preparation for migrating to a new release.

All arrangements for testing should be coordinated with the BellSouth Account Team's Sales Support.

Change Control will communicate the CAVE testing window for each new release.

For additional details on the testing environment, regulations and guidelines, please refer to the following BellSouth public Internet site:

www.interconnection.bellsouth.com/carriertypes/lec/html/oss_info.html

11.0 TERMS AND DEFINITIONS

A

Account Team. The Account Teams represent the CLECs and all CLEC interests within BellSouth, that is, the Account Team is the CLECs' advocate within BellSouth. Some of the Account Team functions are listed below:

- | | |
|---|------------------------------|
| - Contract Negotiations | - BonaFide Requests (BFR) |
| - Enhanced Billing Options Negotiations | - Production Support |
| - Customer Education | - Collocation |
| - Technical Assistance | - Testing Support |
| - General Problem Resolution | - Project/Order Coordination |
| - Tariff Interpretation | - Rate Quotations |

Accountability. Individual(s) having responsibility for completing and producing the outputs of each sub-process as defined in the Detailed Process Flow.

Acknowledgement Notification. Notification returned to originator by BCCM indicating receipt of Change Request.

Approved Release Package. Calendar of Candidate Change Requests with consensus target implementation dates as determined at the Release Package Meeting.

B

BellSouth Change Control Manager (BCCM). BellSouth Point of Contact for processing all Change Requests.

BFR (Bonafide Request). Process used for providing custom products and/or services. Bonafide Requests are outside the scope of the Change Control Process and should be referred to the appropriate BellSouth Account Team.

Business Day. A business day is considered any Monday-Friday workday that does not fall on an official BellSouth holiday.

Business Rules. The logical business requirements associated with the Interfaces referenced in this document. Business rules determine the when and the how to populate data for an Interface. Examples of data defined by Business Rules are:

- The five primary transactions sets: 850, 855, 860, 865, and 997
- Data Element Abbreviation and Definition
- Activity Types at the appropriate level (account, line, feature) and the associated Usage Type (optional, conditional, required, not applicable, prohibited)
- Conditions/rules associated with each Activity and Usage Type
 - ◊ Dependencies relative to other data elements
 - ◊ Conditions which will be edited within BellSouth's OSSs
- Valid Value Set
- Data Characteristics

C

Cancellation Notification. Notification returned to originator by the BCCM indicating a Change Request has been canceled for one of the following reasons: Originator cancellation, duplicate request, training issue, or failure to respond to clarification.

Candidate Request List. List of prioritized Change Requests with associated "Need by Dates" as determined at an Change Review Meeting. These requests will be submitted for sizing and sequencing.

Candidate Change Request. Change Requests that have been prioritized at an Change Review Meeting and are eligible for independent sizing and sequencing by BellSouth and each CLEC.

Change Request. A formal request submitted on a Change Request Form, to add new functionality to existing interfaces, defects and expedited features (as identified in the scope) in a production environment.

- Type 1 – BellSouth System Outage. A System Outage is where the system is totally unusable or there is degradation in an existing feature or functionality within the interface.
- Type 2 – Regulatory Change. Any non-Type 1 changes to the interfaces between the CLEC's and BellSouth's operational support systems mandated by regulatory or legal entities, such as the Federal Communications Commission (FCC), a state commission/authority or state and federal courts.

- **Type 3 – Industry Standard Change.** Any non-Type 1 changes to the interfaces between the CLEC's and BellSouth's operational support systems required to bring these interfaces in line with newly agreed upon telecommunications industry guidelines.
- **Type 4 – BellSouth Initiated Change.** Any non-Type 1 changes affecting the interfaces between the CLEC's and BellSouth's operational support systems which BellSouth desires to implement on its own accord.
- **Type 5 – CLEC Initiated Change.** Any non-Type 1 changes affecting the interfaces between the CLEC's and BellSouth's operational support systems, which the CLEC requests BellSouth to implement.
- **Type 2-5 – Expedited Feature Change.** The inability for a CLEC to process certain types of LSR's based on the existing functionality to BellSouth's Operational Support Systems (OSS's) that are in the scope of CCP. The change request for an expedite must provide details of the business impact and will fall into one of two categories: 1) A submitted defect that has been re-classified as a feature where the CLEC/BellSouth has determined should be expedited due to impact and 2) An ordering enhancement to an existing interface where the CLEC/BellSouth has determined should be expedited due to impact.
- **Type 6 – CLEC Impacting Defect.** Any non-Type 1 change that corrects problems discovered in production versions of an application interface. These problems are where the interface is not working in accordance to the BellSouth baseline user requirements or the business rules that BellSouth has published or otherwise provided to the CLECs. In addition, if functional requirements agreed upon by BellSouth and the CLECs, results in inoperable functionality, even though software user requirements and business rules match; this will be addressed as a defect. These problems typically affect the CLEC's ability to exchange transactions with BellSouth and may include documentation that is in error, has missing information or is unclear in nature. Type 6 validated defects may not be managed using the Expedited Feature Process as discussed in Section 4, Part 3.

Change Request Status. The status of a Change Request as it flows through the Change Control process as described in the Detailed Process Flow.

- **A = Appeal.** Indicates a cancelled Change Request is being appealed by the originator (Step 3).
- **C = Request Cancelled.** Indicates a Change Request has been canceled due to one of the following reasons (Step 3):
 - **CC = Clarification.** Requested clarification not received in allotted time (7 days).
 - **CD = Duplicate Request.** A request for this change already exists.
 - **CT = Training.** Requested change already exists, or CLEC training issue.

- **D = Request Purge.** Indicates the cancellation of a Change Request that has been pending for 12 months and has failed to reach the Candidate Request List (Step 3).
- **I = Change Implemented.** Indicates a Change Request has been implemented in a release (Step 10).
- **N = New Change Request.** Indicates a Change Request has been received by the BCCM, but has not been validated (Step 2).
- **P = Pending.** Indicates a Change Request has been accepted by the BCCM and scheduled for Change Review (Step 3 moving to Step 4).
- **PC = Pending Clarification.** Indicates a Clarification Notification has been sent to the originator, BCCM awaiting response (Step 2 or 3).
- **PN = Pending N times.** Indicates a Change Request reached the Candidate Request List, was sized but not scheduled for a release and has cycled through the process N number of times. Example: P1 = 2nd time through process, P2 = 3rd time through process, etc (Step 8).
- **RC = Candidate Request.** Indicates a Change Request has completed the Change Review process and been assigned to the Candidate Request List for sizing and sequencing (Step 5).
- **S – Request Scheduled.** Indicates a Change Request has been scheduled for a release (Step 8).

Change Review Meeting. Meeting held by the Change Review participants to review and prioritize pending Change Requests, generate Candidate Change Requests, and submit Candidate Change Requests for sizing and sequencing.

Change Review Package. Package distributed by the BCCM 5 – 7 business days prior to the Change Review Meeting. The package includes the Meeting Notice, Agenda, Release Management Status Report, Change Request Log, etc.

Clarification Notification. Notification returned to the originator by the BCCM indicating required information has been omitted from the Change Request and must be provided prior to acceptance of the Change Request. The Change Request will be cancelled if clarification is not received by the date indicated on the Clarification Notification.

CLEC Affecting Change. Any change that requires the CLEC to modify the way they operate or to rewrite system code.

CLEC Change Control Manager (CCCM). CLEC Point of Contact for processing Change Requests.

CSM. Customer Support Manager which supports resale and facility based CLECs.

Cycle Time. The time allotted to complete each step in the Change Control Process prior to moving to the next step in the process.

D

Defect. Any non-type 1 change that corrects problems discovered in production versions of an application interface. These problems are where the interface is not working in accordance to the BellSouth baseline user requirements or the business rules that BellSouth has published or otherwise provided to the CLECs. In addition, if functional requirements agreed upon by BellSouth and the CLECs, results in inoperable functionality, even though software user requirements and business rules match; this will be addressed as a defect.

These problems typically affect the CLEC's ability to exchange transactions with BellSouth and may include documentation that is in error, has missing information or is unclear in nature.

Type 6 validated defects may not be managed using the Expedited Feature Process as discussed in Section 4, Part 3.

Defect Status. The status of a CLEC Impacting Defect Change Request as it flows through the Change Control process as described in the Detailed Process Flow.

- **A = Appeal.** Indicates a cancelled Change Request is being appealed by the originator (Step 3).
- **C = Cancelled.** Indicates a Change Request has been canceled due to one of the following reasons (Step 3):
 - **CC = Clarification.** Requested clarification not received in allotted time (2 days).
 - **CD = Duplicate Request.** A request for this change already exists.
 - **CT = Training.** Requested change already exists, or CLEC training issue.
- **I = Implemented.** Indicates a Defect Change Request has been implemented in a release (Step 6).

-
- **N = New Defect Change Request.** Indicates a Defect Change Request has been received by the BCCM and the change request form validated for completeness (Step 2).
 - **PC = Pending Clarification.** Indicates a Clarification Notification has been sent to the originator, BCCM awaiting response (Step 2 or 3).
 - **S = Scheduled for Release.** Indicates a Defect Change Request has been scheduled for a release (Step 6).
 - **V = Validated Defect.** Indicates internal analysis has been conducted and it is determined that it is a validated defect (Step 3).
 - **W = Workaround Identified.** Indicates a workaround has been developed and communicated to impacted CLEC community (Step 4).

E

Electronic Communications Systems (ECS). ECS is the help desk for reporting system outages or degradation in an existing feature/functionality within an interface. The ECS group works with the CLEC community to resolve system outages/degradation in a timely manner. The telephone number for the ECS group is 1-888-462-8030.

Enhancement. Functions which have never been introduced into the system; improving or expanding existing functions; required functional changes to system interfaces (user and other systems), data, or business rules (processing algorithms – how a process must be performed); any change in the User Requirements in a production system.

Expedited Feature. An expedited feature is the inability for CLEC to process certain types of LSR's based on the existing functionality to BellSouth's operations support systems (OSS's) that are in the scope of Change Control. The change request for an expedite must provide details of the business impact and will fall into one of two categories: 1) a submitted defect that has been re-classified as a feature where the CLEC has determined should be expedited due to impact and 2) an ordering enhancement to an existing interface where the CLEC has determined should be expedited due to impact. For both re-classified defects and ordering enhancement to an existing interface, the rules surrounding the expedited feature request will be:

- Must be an ordering enhancement to an existing interface

-
- Will follow the Expedited Feature process flow which is based on the current Types 2-5 process flow using agreed upon intervals with the exception of Steps 4-6 which are eliminated.
 - The CLEC/BellSouth will be required to give impacts and the consequences for not implementing the feature in the current, next, or minor release, best effort.

H

High Impact. The failure causes impairment of critical system functions and no electronic workaround solution exists.

I

Internal Change Management Process. Internal process unique to BellSouth and each participating CLEC for managing and controlling Change Requests.

L

Low Impact. The failure causes inconvenience or annoyance.

M

Medium Impact. The failure causes impairment of critical system functions, though a workaround solution does exist.

N

Need-by-Date. Date used to determine implementation of a Change Request. This date is derived at the Change Review Meeting through team consensus. Example: 1Q99 or Release XX.

P

Points of Contact (POC). An individual that functions as the unique entry point for change requests on this process.

Priority. The level of urgency assigned for resource allocation to implement a change. Priority may be initially entered by the originator of the Change Request, but may be changed by the BCCM with concurrence from the originator or the Review Meeting participants. In addition, level of priority is not an indication of the timeframe in which the Change Request will be worked. It is the originator's label to determine the priority of the request submitted.

One of four priorities may be assigned:

1-Urgent. Should be implemented as soon as possible. Resources may be pulled from scheduled release efforts to expedite this item. A need-by date will be established during the Change Review Meeting. A special release may be required if the next scheduled release does not meet the agreed upon need-by date.

2-High. Implement in the next possible scheduled major release, as determined during the Release Package Meeting.

3-Medium. Implement in a future scheduled major release. A scheduled release will be established during the Release Package Meeting.

4-Low. Implement in a future scheduled major release only after all other priorities. A scheduled release will be established during the Release Package Meeting.

Project Plan. Document which defines the strategy for Release Management and Implementation, including Scope Statement, Communication Plan, Work Breakdown Structure, etc. See Release Management Project Plan template, Attachment B-1.

Proposed Release Package: Proposed set of change requests slated for a release that the BCCM presents to the CLEC community during the Release Package Meeting

R

Release – Industry. The implementation of new industry standard(s) which may impact and require CLECs to make changes to their interface. An industry release may prohibit the use of an interface upon implementation of the Change(s).

Release – Maintenance. The implementation of scheduled maintenance of a BellSouth system that does not require CLECs to make changes to their interface or prohibit the use of an interface upon implementation. System downtime may be required.

Release – Major. The implementation of scheduled Change(s) which may impact and require the entire CLEC community to make changes to their interface. A major release may prohibit the use of an interface upon implementation of the Change(s).

Release – Minor. The implementation of scheduled Change(s) that may not require CLECs to make changes to their interface or do not prohibit the use of an interface upon implementation.

Release Package. Package distributed by the BCCM listing the Candidate Change Requests that have been targeted for a scheduled release.

Release Package Notification. Package distributed by the BCCM and used to conduct an initial Release Management and Implementation meeting. The package includes the list of participants, meeting date, time, Approved Release Package, Defect and/or Expedite Notification, etc.

Release Schedule: Schedule that contains the intended dates for implementation of software enhancements. This release schedule is created annually.

S

Specifications. Detailed, exact document(s) describing enhancement and/or defects, business processes and documentation changes requested and included with the Change Request as additional information.

System Outage. A System Outage is where the system is totally unusable or there is degradation in an existing feature or functionality within the interface.

V

Version (Document). Indicates variation of an earlier Change Control process document. Users can identify the latest version by the version control number.

APPENDIX A – CHANGE CONTROL FORMS

See Attached Forms

This section identifies the forms to be used during the initial phases of the Change Control process accompanied by a brief explanation of their use. Attachments A1 – A-4A contains sample Change Control forms and line by line Checklists.

Change Request Form. Used when submitting a request for a change (Attachment A-1).

Change Request Form Checklist. Provides line-by-line instructions for completing the Change Request form (Attachment A-1A).

Change Request Clarification Response. Used when responding to request for clarification or Clarification Notification (Attachment A-2).

Change Request Clarification Checklist. Provides line-by-line instructions for completing the Change Request Clarification Response (Attachment A-2A).

Acknowledgement Notification. Advises originator of receipt of Change Request by BCCM (Attachment A-3).

Acknowledgement Notification Checklist. Provides line-by-lines instructions for completing the Acknowledgement Notification. (Attachment A-3A).

Cancellation Notification. Advises the originator of cancellation of a Change Request (Attachment A-3).

Cancellation Notification Checklist. Provides line-by-line instructions for completing the Cancellation Notification. (Attachment A-3B).

Clarification Notification. Advises originator that a Change Request is being held pending receipt of additional information (Attachment A-4).

Clarification Notification Checklist. Provides line-by-line instructions for completing the Clarification Notification. (Attachment A-4A).

Letter of Intent. CLEC provides notice of intent to implement a TCIF compliant interface within a specified timeframe. (Attachment A-5).

APPENDIX B – RELEASE MANAGEMENT

See Attached Forms

Release Management and Project Implementation is described in Step 10 of the Change Control Process. Project Managers are responsible for confirming the release date, developing project plans and requirements, providing the WBS, Gantt chart and Executive Summary to the BCCM for input to the Change Review Package and ensuring the successful implementation of the release.

The BST Change Control Manager (BCCM) will distribute the Release Notification Information via web. The Notification should contain the following information:

- List of participants (Project Managers from each stakeholder)
- Date(s) for the next Project Manage Release meeting(s)
- Times
- Logistics
- Meeting facilitator and minutes originator (rotated between stakeholders)
- Current Approved Release Package (email attachment)
- Current Maintenance/Defect Notification Information (web posting)
- Draft Release Project Plan - WBS (email attachment created by the Lead Project Manager (s) assigned in step 8 of the Change Control Process)
- Lead Project Manager (s) assigned to the Release with reach numbers (s)

Attachments B1 – B12 contain templates designed to assist the Project Manager(s) in conducting project management responsibilities as needed for Release Management and Implementation.

APPENDIX C –ADDITIONAL DOCUMENTS

See Attached Documents

APPENDIX D –BST VERSIONING POLICY FOR INDUSTRY STANDARD ORDERING INTERFACES

Since August 1998, BellSouth's policy, which is stated in its Statement of Generally Accepted Terms (SGAT) and standard interconnection agreement, has been to support two industry standard versions of the applicable electronic interfaces at all times. Currently, the EDI and TAG electronic interfaces are maintained this way, because they are the interfaces that require the CLEC to "build" its side of the interface to use the new standard. The two industry standard versions of an interface are maintained when BellSouth is implementing an entirely new version of an interface based on new industry standards, not when BellSouth is simply enhancing an existing interface. Periodically, the standards organizations for an interface will issue a new set of standards. After submitting the new standards to the CCP to determine how and when they will be implemented, BellSouth will introduce a new version of that interface based on the new standards. BellSouth will keep the "old" version of the interface based on the old industry standards "up" for those CLECs that have not had enough time to build their side of the interface to the new industry standards. BellSouth gives CLECs six (6) months advance notice of the implementation of electronic interfaces based on new industry standards.

When a new industry standard for the interface is issued, the most recent prior industry standard version of the interface will be frozen - no changes will be made to the old version of the interface. BellSouth will support both the new industry standard version and the old industry standard version until the next set of industry standards is issued. Then, BellSouth will support the two most recent industry standard versions of the interface. If, for example, version A were based on the current industry standards, then following the implementation of version B based on the new industry standards, BellSouth would freeze version A until the implementation of version C. Upon the implementation of the version C of the interface based on the newest industry standards, BellSouth would no longer support version A, would freeze version B, and would support both version C and the frozen version B until the implementation of next set of the industry standards.

For example, in March 1998, BellSouth released a new industry standard version of EDI based on TCIF version 7.0. Between March 1998 and January 2000, BellSouth implemented a series of major releases (4.0 and 5.0) and a series of "point releases" (4.1, 4.2, etc. and 5.1, 5.2, etc.). The final "point release" of EDI was Release 5.8. In January 2000, BellSouth implemented Release 6.0 of EDI based on TCIF 9.0. When this occurred, BellSouth began maintaining Release 5.8 alongside of Release 6.0 of EDI.

NOTE: Because LENS is not an industry standard, machine-to-machine interface, LENS is not covered under the policy described above.

APPENDIX E –SUB-TEAM DEFINITION AND ROLES/RESPONSIBILITIES

A Sub-Team will be formed for issues that are more effectively addressed in a small group setting.

The Sub-Team will consist of CLECs and BellSouth who volunteer to participate in meeting(s) to address a specific issue. This team will be responsible for presenting information and making recommendations to the CLEC participants of Change Control.

The Change Control Management Team will be responsible for coordinating meetings and the flow of communications.

APPENDIX F –“SAMPLE” VOTING BALLOT

ITEM NO. XX - Meeting Consensus	<input type="checkbox"/> Agree
Description of Section	<input type="checkbox"/> Generally Agree
	<input type="checkbox"/> Neutral
	<input type="checkbox"/> Somewhat Disagree
	<input type="checkbox"/> Disagree
ITEM NO. XX - Contested Consensus (Voters must disagree with one (1) of the following recommendations and indicate ranking of the other)	<input type="checkbox"/> Agree
Description of Section	<input type="checkbox"/> Generally Agree
CLEC Recommendation	<input type="checkbox"/> Neutral
	<input type="checkbox"/> Somewhat Disagree
	<input type="checkbox"/> Disagree
BellSouth Recommendation	<input type="checkbox"/> Agree
	<input type="checkbox"/> Generally Agree
	<input type="checkbox"/> Neutral
	<input type="checkbox"/> Somewhat Disagree
	<input type="checkbox"/> Disagree

APPENDIX G – CARRIER NOTIFICATIONS

Carrier Notifications for updates to the Local Exchange Ordering Guide - Volume 1 and BellSouth Business Rules for Local Ordering (BBR-LO) indicate if the change impacts documentation only or the electronic and/or manual ordering processes. Details of the change are contained in the Summary of Changes that is distributed to the CLECs via email.

Change Request number(s) will be listed in the associated Carrier Notifications for software releases, if applicable. Associated documentation changes for software releases are also reflected in the Carrier Notification Letter.

A table consisting of the scheduled release dates and an itemization of release features is attached to each revised Carrier Notification letter. Each revised letter provides direct access to the original letter.

NOTE: BellSouth Carrier Notifications are located on the BellSouth Interconnection Website at <http://www.interconnection.bellsouth.com/main/clec.html>.

Transmittal Cover Sheet for Pate Rebuttal Exhibit RMP-3

This sheet transmits the
February 1999 Letter from the FCC's Common Carrier Bureau Chief
which consists of 5 pages.

UNITED STATES GOVERNMENT
memorandum

RECEIVED

FEB 10 1999

DATE: February 10, 1999

REPLY TO

ATTN OF: Jake E. Jennings *JEJ*
Policy & Program Planning Division
Common Carrier Bureau
1919 M Street., NW
Washington, DC 20554

FILE COPY DUPLICATE

SUBJECT: CC Docket No. 97-121, 97-137, 97-208, and 98-121

TO: Ms. Magalie Roman Salas
445 12 St., SW, Room TWB-204
Washington, DC 20554

Please place the attached letter into the record of CC Docket 97-121, 97-137, 97-208, 97-231, and 98-121. If you require further information, please feel free to contact me at 202 418-1580. Thank you for your assistance.



Federal Communications Commission
Washington, D.C. 20554

February 10, 1999

Mr. Sid Boren
Executive Staff Officer
BellSouth Corporation
1155 Peachtree St., N.E., Room 2004
Atlanta, GA 30309

Dear Mr. Boren:

On December 15, 1998, members of the Common Carrier Bureau Staff ("Bureau Staff") met with representatives of BellSouth to discuss interpretations of the Commission's October 13, 1998, BellSouth Louisiana II Order as it might be applied in other states in which section 271 applications might be filed.¹ A summary of the discussion is described below. The Bureau Staff indicated that additional information from BellSouth and interested parties would be useful in order for the Bureau Staff to engage in further discussion. The Bureau Staff also indicated that its views were based on information developed since the issuance of the BellSouth Louisiana II order. The Bureau Staff stated that its views on any of these issues were in no way binding on the Commission, and that no conclusive determination could be made outside the context of an actual Section 271 application and record.

1. Flow-Through.

Issue. Whether BellSouth can exclude complex orders from its flow-through calculations and what level of disaggregation of flow-through is necessary to demonstrate nondiscriminatory access.

Bureau Staff Response The Bureau Staff stated its view that, in principle, complex orders that are manually processed for BellSouth's retail customers could be excluded from flow-through calculations. The Bureau Staff also stated its view that, to the extent BellSouth excludes complex orders from its flow-through calculations, the following information should accompany a future Section 271 application: (1) a clear definition of complex orders for CLECs and BellSouth; (2) a demonstration of how BellSouth handles complex orders for its retail customers and CLECs; (3) evidence that complex orders are processed in a nondiscriminatory manner (i.e., performance results and analysis).

¹ *Application of BellSouth Corporation, BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc., for Provision of In-region, InterLATA Services in Louisiana*, CC Docket No. 98-121, Memorandum Opinion and Order, FCC 98-271 (BellSouth Louisiana II 271 Order).

Mr. Boren

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The Bureau Staff also stated its view that BellSouth could exclude from its flow-through calculation orders submitted by CLECs that contained CLEC-caused errors. The Bureau Staff stated its view that the flow-through calculation could be adjusted to exclude CLEC errors, if, in a future Section 271 application, BellSouth (1) defines more clearly what constitutes a CLEC error; and (2) verifies the cause of the errors as being CLEC errors (e.g., through an independent audit).

In response to questions about the appropriate level of disaggregation the Bureau Staff indicated its view that the proposed levels of disaggregation listed in the *OSS Model Rules NPRM*² were appropriate.

2. TAFI Integration

Issue. (1) Whether BellSouth must provide a machine-to-machine repair and maintenance interface in order to meet the nondiscrimination requirement. (2) Absent a machine-to-machine repair and maintenance interface, what evidence is necessary to demonstrate nondiscriminatory access.

Bureau Staff Response The Bureau Staff stated its view that it did not believe that machine-to-machine repair and maintenance interface is *per se* required. The Bureau Staff noted that the Louisiana II Order found that a lack of machine-to-machine interface for repair and maintenance was not *per se* discriminatory. The Bureau Staff stated its view that, absent a machine-to-machine repair and maintenance interface, BellSouth must demonstrate that the interfaces offered to CLECs provide nondiscriminatory access. The Bureau Staff also stated that additional information was needed to assess the competitive impact that results from a lack of a machine-to-machine interface for repair and maintenance. In order to obtain such information, the Bureau Staff indicated that it would schedule additional meetings with interested parties.

The Bureau Staff stated its view that the following information would assist in evaluating in a future application whether BellSouth's repair and maintenance interface provide nondiscriminatory access: (1) a detailed description of the systems and functionality BellSouth utilizes itself for both designed and nondesigned services; (2) a detailed description of the systems and functionality BellSouth offers to competing carriers; (3) a discussion of what interface functionality competing carriers have requested through the change control process and the status of such request, if any; and (4) performance results for resold services and UNEs by interface type.

² See *Performance Measurements and Reporting Requirements for Operations Support Systems, Interconnection, and Operator Services and Directory Assistance*, CC Docket No. 98-56, Notice of Proposed Rulemaking, 13 FCC Rcd 12817 (1998).

Mr. Boren

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3. Retail Analogues/Performance Standards/Statistical Measurements.

Issue. Methods of evaluating whether BellSouth's OSS performance meets the nondiscrimination requirement.

Bureau Staff Response The Bureau Staff asked BellSouth to propose a framework for evaluating whether it is providing nondiscriminatory access to OSS functions and suggested that BellSouth include the following criteria:

- Relevant performance measurements;
- Identification of retail analogues, including level of disaggregation;
- Identification of a benchmark or performance standard where no retail analogue exists (e.g., based on state approved intervals, engineering studies, or other standards);
- A statistical methodology which is used to compare actual performance results to retail analogues or benchmarks;
- A threshold for determining whether differences in performance are competitively significant and whether analysis of the underlying cause for the difference is needed;
- An open process for analyzing the underlying cause for differences of performance;
- Meaningful penalty amounts to prevent "backsliding."

The Bureau Staff also indicated that it would seek industry comment of any framework for evaluating OSS performance proposed by BellSouth.

4. Complex Ordering/Partial Migration Orders.

Issue. Whether partial migration and directory listing need to be ordered electronically.

Bureau Staff Response The Bureau Staff stated its view that there is no retail analog for partial migration orders, and that electronic ordering capability is not required at this time. The Bureau Staff stated its view that BellSouth must demonstrate that the ordering process for complex/partial migration orders meets the nondiscrimination requirement (e.g., provides an efficient competitor a meaningful opportunity to compete). The Bureau Staff also stated its

Mr. Boren

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view that BellSouth should continue upgrading its OSS ordering interface through the change control process.

5. **Third-Party Testing -- Demonstration of Operational Readiness.**

Issue. In cases where there is little or no commercial usage of an interface, whether BellSouth must engage in third-party testing at the level implemented by Bell Atlantic in New York .

Bureau Staff Response The Bureau Staff noted that, in its view, internal testing cannot overcome evidence from commercial usage demonstrating inferior service to CLECs. The Bureau Staff stated its view that, where there is no commercial usage or inconclusive commercial usage exists, some form of testing is necessary to demonstrate that the BOC's OSS is operationally ready. The Bureau Staff indicated its view that, while it could not conclude, in the absence of a factual record, whether some forms of internal testing or carrier to carrier testing could demonstrate operational readiness, a third party test would serve as a reasonable "safe harbor." The Bureau Staff noted as two examples of such tests underway in New York and Texas. The Bureau Staff stressed the importance, in its view, of a test plan that included input from interested parties and includes meaningful independent review (e.g., State Commission oversight).

For information purposes, a copy of this letter will be placed in all open section 271 dockets.

Sincerely,



Lawrence E. Strickling, Chief
Common Carrier Bureau
Federal Communications Commission

cc: Ms. Magalie Roman Salas
Secretary
Federal Communications Commission

Tennessee Regulatory Authority
Docket No. 01-00193
Exhibit RMP-4

Transmittal Cover Sheet for Pate Rebuttal Exhibit RMP-4

This sheet transmits the
Flow-through Matrix Excerpt for Tennessee Performance Metrics
which consists of 3 pages

LSR Flow-Through Matrix

Product	FT ^{3,5}	Complex Service	Complex Order	Planned F allout For Manual Handling ¹	EDI	TAG ²	LENS ⁴	Comments
2 wire analog DID trunk port	No	UNE	Yes	NA	N	N	N	
2 wire analog port	Yes	UNE	No	No	Y	Y	N	
2 wire ISDN digital line side port	No	UNE	Yes	NA	N	N	N	
2 wire ISDN digital loop	Yes	UNE	Yes	No	Y	Y	N	
3 Way Calling	Yes	No	No	No	Y	Y	Y	
4 wire analog voice grade loop	Yes	UNE	Yes	No	Y	Y	N	
4 wire DS0 & PRI digital loop	No	UNE	Yes	NA	N	N	N	
4 wire DS1 & PRI digital loop	No	UNE	Yes	NA	N	N	N	
4 wire ISDN DSI digital trunk ports	No	UNE	Yes	NA	N	N	N	
Accupulse	No	Yes	Yes	NA	N	N	N	
ADSL	Yes	UNE	No	No	Y	Y	N	
Area Plus	Yes	No	No	No	Y	Y	Y	
Basic Rate ISDN	No	Yes	Yes	Yes	Y	Y	N	
Call Block	Yes	No	No	No	Y	Y	Y	
Call Forwarding-Variable	Yes	No	No	No	Y	Y	Y	
Call Return	Yes	No	No	No	Y	Y	Y	
Call Selector	Yes	No	No	No	Y	Y	Y	
Call Tracing	Yes	No	No	No	Y	Y	Y	
Call Waiting	Yes	No	No	No	Y	Y	Y	
Call Waiting Deluxe	Yes	No	No	No	Y	Y	Y	
Caller ID	Yes	No	No	No	Y	Y	Y	
CENTREX	No	Yes	Yes	NA	N	N	N	
DID WITH PBX ACT W	No	Yes	Yes	Yes	Y	N	Y	
DID ACT W	No	Yes	Yes	Yes	Y	N	Y	
Digital Data Transport	No	UNE	Yes	NA	N	N	N	
Directory Listing Indentions	No	No	No	Yes	Y	Y	Y	
Directory Listings Captions	No	No	Yes	Yes	Y	Y	Y	
Directory Listings (simple)	Yes	No	No	No	Y	Y	Y	
DS3	No	UNE	Yes	NA	N	N	N	
DS1 Loop	Yes	UNE	Yes	No	Y	Y	N	
DSO Loop	Yes	UNE	Yes	No	Y	Y	N	
Enhanced Caller ID	Yes	No	No	No	Y	Y	Y	
ESSX	No	Yes	Yes	NA	N	N	N	
Flat Rate/Business	Yes	No	No	No	Y	Y	Y	
Flat Rate/Residence	Yes	No	No	No	Y	Y	Y	
FLEXSERV	No	Yes	Yes	NA	N	N	N	
Frame Relay	No	Yes	Yes	NA	N	N	N	
FX	No	Yes	Yes	NA	N	N	N	
Ga. Community Calling	Yes	No	No	No	Y	Y	Y	
HDSL	Yes	UNE	No	No	Y	Y	N	

LSR Flow-Through Matrix

Product	F/T ^{3,5}	Complex Service	Complex Order	Planned F allout For Manual Handling ¹	EDI	TAG ²	LENS ⁴	Comments
Hunting MLH	No	C/S ⁴	C/S	Yes	Y	Y	N	
Hunting Series Completion	Yes	C/S	C/S	No	Y	Y	Y	
INP to LNP Conversions	No	UNE	Yes	Yes	Y	Y	N	
LightGate	No	Yes	Yes	NA	N	N	N	
Line Sharing	Yes	UNE	No	No	Y	Y	N	
Local Number Portability	Yes	UNE	Yes	No	Y	Y	N	
LNP with Complex Listing	No	UNE	Yes	Yes	Y	Y	N	
LNP with Partial Migration	No	UNE	Yes	Yes	Y	Y	N	
LNP with Complex Services	No	UNE	Yes	Yes	Y	Y	N	
Loop+INP	Yes	UNE	No	No	Y	Y	N	
Loop+LNP	Yes	UNE	No	No	Y	Y	N	
Measured Rate/Bus.	Yes	No	No	No	Y	Y	Y	
Measured Rate/Res.	Yes	No	No	No	Y	Y	Y	
Megalink	No	Yes	Yes	NA	N	N	N	
Megalink-T1	No	Yes	Yes	NA	N	N	N	
Memory Call	Yes	No	No	No	Y	Y	Y	
Memory Call Ans. Svc.	Yes	No	No	No	Y	Y	Y	
Multiserv	No	Yes	Yes	NA	N	N	N	
Native Mode LAN Interconnection (NMLI)	No	Yes	Yes	NA	N	N	N	
Off-Prem Stations	No	Yes	Yes	NA	N	N	N	
Optional Calling Plan	Yes	No	No	No	Y	Y	Y	
Package/Complete Choice and area plus	Yes	No	No	No	Y	Y	Y	
Pathlink Primary Rate ISDN	No	Yes	Yes	NA	N	N	N	
Pay Phone Provider	No	No	No	NA	N	N	N	
PBX Standalone ACT A,C, D	No	Yes	Yes	Yes	Y	Y	N	
PBX Trunks	No	Yes	Yes	Yes	Y	Y	N	
Port/Loop Combo	Yes	UNE	No	No	Y	Y	Y	
Port/Loop PBX	No	No	No	Yes	Y	Y	N	
Preferred Call Forward	Yes	No	No	No	Y	Y	Y	
RCF Basic	Yes	No	No	No	Y	Y	Y	
Remote Access to CF	Yes	No	No	No	Y	Y	Y	
Repeat Dialing	Yes	No	No	No	Y	Y	Y	
Ringmaster	Yes	No	No	No	Y	Y	Y	
Smartpath	No	Yes	Yes	NA	N	N	N	
SmartRING	No	Yes	Yes	NA	N	N	N	
Speed Calling	Yes	No	No	No	Y	Y	Y	
Synchronet	No	Yes	Yes	Yes	Y	Y	N	
Tie Lines	No	Yes	Yes	NA	N	N	N	
Touchtone	Yes	No	No	No	Y	Y	Y	
Unbundled Loop-Analog 2W, SL1, SL2	Yes	UNE	No	No	Y	Y	Y	

LSR Flow-Through Matrix

Product	F/T ^{3, 5}	Complex Service	Complex Order	Planned F allout For Manual Handling ¹	EDI	TAG ²	LENS ⁴	Comments
WATS	No	Yes	Yes	NA	N	N	N	
XDSL	Yes	UNE	No	No	Y	Y	N	
XDSL Extended LOOP	No	UNE	Yes	NA	N	N	N	
Collect Call Block	Yes	No	No	No	Y	Y	Y	
900 Call Block	Yes	No	No	No	Y	Y	Y	
3rd Party Call Block	Yes	No	No	No	Y	Y	Y	
Three Way Call Block	Yes	No	No	No	Y	Y	Y	
PIC/LPIC Change	Yes	No	No	No	Y	Y	Y	
PIC/LPIC Freeze	Yes	No	No	No	Y	Y	Y	

Note¹: Planned Fallout for Manual Handling denotes those services that are electronically submitted and are not intended to flow through due to the complexity of the service.

Note²: The TAG column includes those LSRs submitted via Robo TAG.

Note³: For all services that indicate 'No' for flow-through, the following reasons, in addition to errors or complex services, also prompt manual handling: Expedites from CLECs, special pricing plans, denials restore and conversion or disconnect and conversion both required, partial migrations (although conversions-as-is flow through for issue 9), class of service invalid in certain states with some TOS e.g. government, or cannot be changed when changing main TN on C activity, low volume e.g. activity type T=move, pending order review required, more than 25 business lines, CSR inaccuracies such as invalid or missing CSR data in CRIS, Directory listings – Intentions, Directory listings – Captions, transfer of calls option for CLEC end user – new TN not yet posted to BOCRIS. Many are unique to the CLEC environment.

Note⁴: Services with C/S in the Complex Service and/or the Complex Order columns can be either complex or simple.

Note⁵: EELs are manually ordered.